

EXHIBIT 23

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

X.COMMERCE, INC. D/B/A MAGENTO, INC.,) Case No.: 3:17-cv-02605-RS
)
Plaintiff,)
) MAGENTO'S SUPPLEMENTAL
vs.) PATENT LOCAL RULE 3-3
) INVALIDITY CONTENTIONS AND
) PATENT LOCAL RULE 3-4
) DISCLOSURES
EXPRESS MOBILE, INC.,)
)
Defendant.)
)
)

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I. INTRODUCTION

Pursuant to the Local Rules of Practice for Patent Cases before the United States District Court for the Northern District of California (“Patent L.R.”) 3-3 and 3-4, plaintiff and patent counterclaim-defendant X.commerce, Inc. d/b/a Magento, Inc. (“Magento”) hereby serves these Supplemental Invalidity Contentions.¹ These Invalidity Contentions, including the charts attached as Exhibits hereto, identify prior art currently known to and understood by Magento that anticipates and/or renders obvious the patent claims asserted in this action under 35 U.S.C. §§ 102 and/or 103. These Invalidity Contentions point out, as non-limiting examples, where in each item of prior art the limitations of the Asserted Claims are disclosed, and also include an identification of combinations of prior art showing obviousness. These Invalidity Contentions also disclose grounds of invalidity under 35 U.S.C. §§ 101 and 112(1) and (2) for certain claims of the Asserted Patents due to patent ineligibility, indefiniteness, lack of enablement, and/or lack of written description.

In Express Mobile’s Infringement Contentions Pursuant to Patent L.R. 3-1 and 3-2 (“Infringement Contentions”), Express Mobile, Inc. (“Express Mobile”) alleges the following claims are infringed:

- Claims 1-6, 9-11, 14-15, 17, 20, 23-25, 35, and 37 of U.S. Patent No. 6,546,397, (“the ’397 patent”)
- Claims 1-6 of U.S. Patent No. 7,594,168 (“the ’168 patent”)

Express Mobile confirmed after service of its Infringement Contentions that it is not asserting claims 19, 23, 29, or 30 of the ’397 patent.

The ’397 Patent and ’168 Patent are collectively referred to as the “the Express Mobile patents,” the “Patents-in-Suit,” or the “Asserted Patents.” The above-identified

¹ To the extent that any item of prior art identified in these Invalidity Contentions is not included in Magento or Express Mobile’s document production, such prior art is available for inspection and copying upon request.

In addition to the disclosures in this supplement, Magento reserves the right to rely upon all disclosures in Magento’s Patent Local Rule 3-3 Invalidity Contentions and Patent Local Rule 3-4 Disclosures dated January 25, 2018.

1 claims of the Patents-in-Suit are referred to as the “Asserted Claims.”

2 Pursuant to Patent L.R. 3-3 and 3-4, Magento hereby provides supplemental disclosures
3 and related documents pertaining only to the Asserted Claims as identified by Express Mobile in
4 its Infringement Contentions.

5 Express Mobile’s piecemeal productions of prior art evidence in its possession, requiring
6 repeated requests and follow-up from Magento as well as time to review the prior art and install a
7 working copy, affected Magento’s ability to provide this supplement any earlier. For example,
8 Express Mobile did not produce a CD containing a sample of SilverStream 1.5 software before
9 May 21, 2019, which is relied upon in these contentions. Due to the age of the software, Magento
10 encountered various difficulties installing a working copy. As another example, Express Mobile
11 did not produce exhibits to the Expert Report of Chris Schmandt Regarding Invalidity of Asserted
12 Claims from *Express Mobile LLC v. Svanaco, Inc.*, No. 2:17-cv-130-JRG (E.D. Tex.) until June
13 18, 2019, which provided further prior art evidence.²

14 **II. RESERVATION OF RIGHTS**

15 During the vast majority of time that Magento was conducting its initial investigation of
16 prior art, Express Mobile had not provided specific alleged conception dates. Rather, Express
17 Mobile’s November 20, 2017 Patent L.R. 3.1(f) disclosures relied upon the purported December
18 2, 1999 filing date of Application No. 09/454,061 as the priority date to which the Asserted
19 Patents are entitled.

20 Express Mobile did not provide any alleged conception dates for the Asserted Patents until
21 January 11, 2018, when it served Defendant’s Response to Plaintiff’s First Set of Interrogatories
22 alleging a conception date “at least as early as April 1999” for “[t]he subject matter of at least
23 some of the claims” and a reduction to practice “at least as early as June 1999.” Express Mobile
24 still has not specified which claims it contends were conceived “at least as early as April 1999.”

25
26
27
28 ² On May 23, 2019, Magento provided notice to Express Mobile of its intent to supplement its
invalidity contentions.

1 Magento has relied on Express Mobile's assertions in its Patent L.R. 3.1(f) disclosures in
2 identifying and selecting prior art in connection with these Invalidity Contentions. Magento
3 reserves the right to amend these Invalidity Contentions for good cause and/or modify its
4 selection of prior art references to the extent Express Mobile finally specifies which claims were
5 allegedly conceived prior to December 2, 1999 and when; provides a different date of alleged
6 conception and corroborating evidence; or to the extent that discovery and/or events in the case
7 reveal that Express Mobile is not entitled to its claimed conception and/or priority dates.
8 Magento also reserves the right to amend these Invalidity Contentions and/or to modify its
9 selection of prior art references in the event that Express Mobile serves supplemental or modified
10 infringement contentions. Magento reserves the right to amend these Invalidity Contentions in
11 the event that the applicable legal standard changes.

12 Further, consistent with Patent L.R. 3-6 and in view of the following, Magento
13 reserves the right to supplement or otherwise amend these Invalidity Contentions.

14 The information and documents that Magento discloses pursuant to Patent L.R. 3-3
15 and 3-4 are based on information currently available to Magento and subject to
16 supplementation or amendment as new information emerges over the course of this litigation.
17 For example, Express Mobile (or its counsel) may be in possession of prior art of which
18 Magento is currently unaware. As another example, because discovery has only recently
19 begun, Magento has not yet completed its search for and analysis of relevant prior art.
20 Magento thus reserves the right to amend and/or supplement these Invalidity Contentions,
21 including identifying and relying on additional references, should further discovery and
22 analysis yield additional information or references, consistent with the Patent Local Rules
23 and the Federal Rules of Civil Procedure. Indeed, Magento has not yet completed its
24 discovery from third parties such as prior art fact witnesses who likely have information
25 concerning the prior art identified herein and additional prior art. Such discovery likely will
26 reveal information that impacts the disclosures and contentions herein.

27 Magento reserves the right to revise its Invalidity Contentions and invalidity theories,
28 depending upon events in this litigation including, but not limited to, the Court's construction

1 of claim terms or elements of the Asserted Claims, discovery into the priority date of the
2 Asserted Claims, and/or positions that Express Mobile or its fact or expert witness(es) may
3 take concerning claim construction, infringement, and/or invalidity issues. Prior art not
4 included in this disclosure, whether currently known or not known to Magento, may become
5 relevant in the future. In particular, Magento is currently unaware of the extent, if any, to
6 which Express Mobile will contend that limitations of the Asserted Claims are not disclosed
7 in the prior art identified by Magento, or will contend that any of the identified references do
8 not qualify as prior art. To the extent that such an issue arises, Magento reserves the right to
9 identify other known components or references that *inter alia* would have made the addition
10 of the allegedly missing limitation to the claimed device or method obvious.

11 Magento's claim charts attached hereto cite to particular exemplary teachings and
12 disclosures of the prior art as applied to features of the Asserted Claims. However, persons
13 having ordinary skill in the art generally view an item of prior art in the context of other
14 publications, literature, products, and their understanding. The fact that Magento is
15 providing citations to exemplary portions of the prior art references should not be construed
16 to mean that other portions of the prior art references are not relevant to the validity of the
17 claims. As such, the cited portions are only examples of what is taught by the prior art
18 reference, and Magento reserves the right to rely on portions of the prior art references that
19 are not explicitly cited. Magento further reserves the right to rely on other publications and
20 expert testimony as aids in understanding and interpreting the cited portions, as providing
21 context thereto, and as additional evidence that the prior art discloses a claim limitation.
22 Magento further reserves the right to rely on uncited portions of the prior art references, other
23 publications, and testimony to establish bases for combinations of certain cited references
24 that render the asserted claims obvious, as a basis for asserting invalidity of the Patents-in-
25 Suit and/or as necessary or appropriate to supplement its contentions with additional citations
26 and evidence, including to rebut criticisms by Express Mobile or its fact and expert
27 witnesses. Further, for any combination, Magento reserves the right to rely additionally on
28 information generally known to those skilled in the art and/or common sense. Magento also

1 reserves the right for its expert witness(es) to opine regarding additional reasons that the
2 Asserted Claims are met by the prior art and/or that a combination of prior art references may
3 be obvious in view of information known to one skilled in the art.

4 The references discussed in the claim charts may disclose the elements of the asserted
5 claims explicitly and/or inherently, and/or they may be relied upon to show the state of the
6 art in the relevant time frame. The suggested obviousness combinations are provided in the
7 alternative to Magento's anticipation contentions and are not to be construed to suggest that
8 any reference included in the combinations is not by itself anticipatory.

9 For purposes of these Invalidity Contentions, Magento identifies prior art references and
10 provides element-by-element claim charts based in part on its present understanding of the
11 Asserted Claims and the apparent constructions of the Asserted Claims advanced by Express
12 Mobile in its Infringement Contentions. The Court has not yet construed any claims of the
13 Asserted Patents. Nothing stated herein shall be treated as an admission or suggestion that
14 Magento agrees with Express Mobile regarding either the scope of any of the Asserted Claims or
15 the claim constructions advanced by Express Mobile in its Infringement Contentions or anywhere
16 else. Magento's Invalidity Contentions should not be seen as a suggestion or concession that
17 Express Mobile's reading of the Asserted Claims is correct. Magento expressly reserves the right
18 to contest such claim constructions. Instead, the citation of prior art herein and the accompanying
19 exhibits are being disclosed as, and should be construed as, nothing more than Magento's
20 Invalidity Contentions in view of the current state of the litigation and the information presently
21 available to Magento. These contentions are not intended to reflect or limit Magento's claim
22 construction contentions, which will be disclosed in due course in accordance with the deadlines
23 set by the Court in the Case Management Scheduling Order (Dkt. No. 52). Express Mobile's
24 vague Infringement Contentions make it impossible at this juncture to know exactly what
25 positions will be taken during claim construction and therefore also make it impossible to know
26 all of the prior art that may ultimately prove to be relevant. Accordingly, for purposes of these
27 Invalidity Contentions, Magento may adopt alternative claim construction positions in applying
28 prior art. Magento offers such contentions in response to Express Mobile's Infringement

1 Contentions and without prejudice to any position it may ultimately take as to any claim
2 construction issues. Moreover, nothing herein admits in any way that any of Magento's accused
3 products or services, or any of Magento's other products or services, infringe any of the Asserted
4 Claims.

5 Magento further reserves the right to assert that the patents are unenforceable due to
6 inequitable conduct at least on the grounds that any of the references identified herein were
7 material and withheld with an intent to deceive the Patent Office, or for any other ground that
8 may become known during discovery.

9 Magento's Invalidity Contentions are based on the specific claims that Express
10 Mobile has identified as asserted in its Infringement Contentions, and Magento has not
11 attempted to address invalidity or prior art for any of the claims that are not asserted because
12 those claims are not at issue in the present matter.

13 Magento reserves the right to supplement or otherwise amend these Invalidity
14 Contentions in response to any proposed claim constructions or alleged supporting evidence
15 offered by Express Mobile, any report or declaration from any expert witness for Express
16 Mobile regarding claim construction issues, and any claim construction briefing filed by
17 Express Mobile. Further, should Express Mobile be permitted by the Court to amend its
18 Infringement Contentions to assert additional or alternative claims, theories of infringement,
19 or accused instrumentalities, Magento specifically reserves the right to modify, amend, or
20 supplement these Invalidity Contentions. Moreover, Magento reserves the right to
21 supplement or otherwise amend these Invalidity Contentions after the Court's claim
22 construction ruling.

23 Certain of the Asserted Claims may be invalid due to limitations that are indefinite,
24 lacking written description, or lacking enablement, including limitations that may be subject
25 to interpretation as means-plus-function or step-plus-function limitations. The Exhibits
26 hereto provide exemplary disclosures of such limitations in the prior art or disclosures that
27 anticipate and/or render such limitations obvious alone or in combination with other
28 references and/or the knowledge of a person of ordinary skill. However, as noted above, the

1 Exhibits hereto are being disclosed as part of Magento's Invalidity Contentions, and should
2 not be thought to reflect or limit Magento's claim construction contentions, or to suggest that
3 a claim is not in fact indefinite, lacking written description, or lacking enablement.

4 In addition, certain limitations of the Asserted Claims may be subject to interpretation
5 under 35 U.S.C. § 112(6) because it invokes the phrase "means." The Exhibits hereto
6 provide exemplary prior art disclosures of corresponding structure or steps for accomplishing
7 the recited function. This disclosure is not an admission that corresponding structure is
8 adequately disclosed by the specification or an admission regarding the appropriate
9 construction of the claims.

10 Throughout the attached Exhibits, Magento provides exemplary citations indicating
11 where the cited references disclose subject matter recited in the preambles of the claims,
12 without regard to whether the preambles are ultimately determined to be limitations of the
13 claims. Magento does not take any position at this time regarding whether or not the
14 preambles of the Asserted Claims are limitations, and will address this topic during the
15 scheduled claim construction process.

16 **III. DISCLOSURES PURSUANT TO PATENT LOCAL RULE 3-3(A)-(C)**

17 Magento contends that the Asserted Claims are invalid as anticipated by prior art
18 under 35 U.S.C. § 102 and/or that the Asserted Claims are obvious in view of prior art and
19 the knowledge of a person having ordinary skill in the art under 35 U.S.C. § 103. Magento
20 reserves the right to rely on any identified piece of prior art individually to anticipate the
21 Asserted Claims and/or to render them obvious in view of the knowledge of one having
22 ordinary skill in the art or in combination with other references identified herein. Magento
23 reserves the right to respond to any allegations of secondary considerations of obviousness
24 set forth by Express Mobile or its expert witness, in due course under the schedule to be set
25 by the Court for expert reports and discovery.

26 The charts attached in the Exhibits to these Invalidity Contentions specifically point
27 out, as non-limiting examples, where the prior art identified by Magento anticipates, either
28 expressly or inherently, and/or renders obvious each element of the Asserted Claims. By

1 providing citations to exemplary and illustrative portions of the prior art references, that
2 should not be construed to mean that other portions of the prior art references are not also
3 relevant to the validity of the claims. Other passages of the identified prior art may
4 additionally disclose, either expressly or inherently, information relevant to the validity of
5 one or more elements of the Asserted Claims. Although Magento may not have expressly
6 quoted those other portions to avoid excessive, cumulative citations, having set forth the
7 bases for concluding that the claims are invalid over the prior art references, Magento
8 reserves the right to rely on any unquoted portions of the prior art as further evidence of the
9 invalidity of the Asserted Claims. Moreover, Magento reserves the right to rely on any
10 evidence, including expert testimony, to provide context to or aid in understanding the cited
11 portions of the identified prior art. Where Magento cites to a particular drawing or figure, the
12 citation is expressly intended to encompass the drawing or figure, as well as any text
13 associated with the drawing or figure. Similarly, where Magento cites to particular
14 description of or text associated with a drawing or figure, the citation is expressly intended to
15 encompass that drawing or figure as well.

16 As noted, Magento is not yet aware of how Express Mobile will ultimately contend
17 the Asserted Claims should be construed. Depending on Express Mobile's assertions on
18 claim construction, different ones of the references discussed in the Exhibits hereto may be
19 of greater or lesser relevance, and different combinations of these references may be
20 implicated. In view of Magento's uncertainty regarding how Express Mobile will contend
21 the claims apply, the discussion of the different references in the Exhibits may reflect
22 alternative applications of the prior art against the Asserted Claims.

23 Certain pieces of identified prior art inherently or implicitly disclose features of the
24 Asserted Claims. Magento reserves the right to rely on inherency and/or secondary
25 documents to demonstrate the invalidity of the Asserted Claims based on the inherent or
26 implicit disclosure in these cited prior art references. Further, Magento may rely on any
27 evidence, including expert testimony, to establish the express, implicit, or inherent disclosure
28 of certain features of the prior art, or the knowledge of a person of ordinary skill in the art, to

1 invalidate the Asserted Claims. Magento also reserves the right to rely on any evidence,
2 including expert testimony, to prove that the disclosures or prior art cited herein are enabled
3 or to explain the meaning of a term used in the disclosures or any prior art cited herein.

4 With regard to the prior art that Magento identifies as rendering the Asserted Claims
5 obvious, non-limiting examples of the reasons why the prior art renders the asserted claims
6 obvious, including exemplary identification of any such combinations of prior art showing
7 obviousness is provided below. Magento contends that each charted prior art item can be
8 combined with other charted prior art items when a particular prior art item lacks or does not
9 explicitly disclose an element or feature of an Asserted Claim including for the reasons
10 discussed herein, as well as for reasons to be explained by expert testimony according to the
11 Court's schedule for such disclosures. Generally, for all prior art combinations addressed
12 herein, a reason or motivation to combine the prior art includes that each prior art reference
13 related to the Patents-in-Suit is related to the field of website creation, and many are in the
14 specific field of WYSIWYG webpage editors used for website creation, and further in the
15 even more specific field of browser-based WYSIWYG webpage editors.

16 One of ordinary skill in the art tasked with implementing such a system in accordance
17 with the Asserted Claims would be motivated to investigate the various existing systems,
18 solutions, patents, and other publications, including those identified herein, to address his or
19 her particular needs. The combinations and modifications of the prior art to invalidate the
20 Asserted Claims would have arisen from ordinary innovation, ordinary skill, or common
21 sense and/or would have been obvious to try or otherwise predictable in the fields of website
22 creation. A person of ordinary skill would have had a reasonable expectation of success in
23 combining known prior art to achieved the claimed inventions given that the results achieved
24 in the field of website creation are predictable, since software code implemented according to
25 well-known programming languages, and especially where the Asserted Claims are directed
26 to well-known prior art functionality.

27 A person having ordinary skill in the art would have been motivated to combine the
28 prior art based on the nature of the problem to be solved, the teachings of the prior art, and

1 the knowledge of persons having ordinary skill in the art. For example, each of the prior art
2 references for the Patents-in-Suit addresses the problem of designing software for creating
3 and displaying websites or components of websites. In addressing the problem, one of
4 ordinary skill in the art would have been motivated to combine the teachings of such
5 significant research. For example, a person of ordinary skill designing software tools for
6 creating and displaying websites would have looked to all the teachings of the prior art
7 regarding functionality that a user might wish to integrate into a webpage or to display the
8 webpage, and would have incorporated such functionality into the software to appeal to
9 users. Indeed, a person of ordinary skill would have understood the problem that laymen do
10 not possess knowledge of the programming language(s) that may be used to create websites.
11 *See, e.g.*, U.S. Patent No. 6,185,587 (“Bernardo”) at 1:61-67 (“Among the inherent
12 difficulties in creating and maintaining such Web sites is that the HTML used to define the
13 Web pages . . . is difficult to compose and read.”). A person of ordinary skill would have
14 recognized the desirability of simplifying the process of creating and displaying webpages
15 and webpage components. *E.g., id.*; *see also* U.S. Patent No. 5,842,020 (“Faustini”) at 4:59-
16 67 (“As the Java system and applet creation becomes more widely used, the need to simplify
17 the development of these applications becomes desirable.”); Zhengin Yan and Kang Zhang,
18 *A Visual Programming Tool for User Interface and Web Page Generation* (1998) (“Yan”) at
19 3 (“A good user interface design should reduce the user’s information load and avoid
20 overloading the user’s memory, because people are better at recognizing information than
21 recalling information. The user should not be expected to recall a set of complex commands.
22 Instead, a list of commands, options, or data should be presented to the user [Treu 94].”).

23 A person of ordinary skill would also have recognized the need to minimize the size
24 of files required to display a webpage in light of limited user bandwidth, and would have
25 looked to all known techniques and research to address this problem. *See, e.g.*, William
26 Stanek, *Java Archives in Java 1.2*, PC Magazine 1999 (“Stanek”) (“An added bonus of using
27 compressed archive files is that they can greatly improve the performance of applets, and
28 these performance benefits extend to both sides of the client/server Web equation.

1 Compressed archives take up less file space, and your browser can download these archives
 2 many times faster than the original uncompressed files. On the Web server, the time savings
 3 are also substantial. With separate files, the server generates a separate HTTP transaction for
 4 each file. Each transaction uses server resources and can take a few seconds to generate.
 5 Thus, by bundling many files into a single file, you can speed up the server's response time
 6 and reduce the dreaded wait—and we all hate to wait.”); David Flanagan, *Java in a Nutshell*,
 7 O'Reilly (1997) at 99-100 (“Prior to Java 1.1, each of these files was loaded through a
 8 separate HTTP request, which is fairly inefficient. With Java 1.1, all (or many) of the files
 9 an applet needs can be combined into a single JAR file, which an applet viewer or Web
 10 browser can download with a single HTTP request. [In addition, a manifest file in the JAR]
 11 can be used by the applet viewer or Web browser to verify that the files in the archive have
 12 not been corrupted since the JAR was created.”); Martin Gaedke et al., *Web Content Delivery*
 13 *to Heterogenous Mobile Platforms* (1998) (“Gaedke”) at 206 (“Information to be delivered to
 14 mobile devices may have to be adapted to bandwidth availability and transmission cost.”).

15 A person of ordinary skill would have further recognized the problem of displaying a
 16 webpage on devices with disparate display capabilities and browser window sizes, and would
 17 have looked to all known techniques and research to address this problem. *See, e.g.*, U.S.
 18 Patent No. 6,300,947 (“Kanevsky”) at 1:18-21 (“If such a web site is accessed from devices
 19 with small screens (e.g., pamltops, web phones), only small parts of the web pages can be
 20 viewed by users”); Gaedke at 206 (“PDAs and other mobile devices have very little
 21 screen real estate compared to desktop computers.”); U.S. Patent No. 6,396,500 (“Qureshi”) at 3:38-46 (“Although the browser is used to generate a graphical display of objects included
 22 in an HTML page, the dimensions of the browser's display window can differ from the
 23 dimensions initially coded for the display space of the page. The size of the browser's
 24 display window can vary according to the resolution of the video display or the window
 25 dimensions that are selected by a user.”).

26
 27 The knowledge of a person of ordinary skill in the 1999 timeframe would have
 28 included all prior art, including knowledge of the features of various programming languages

1 available at the time of the invention, and a person of ordinary skill in the art would have
 2 considered the prior art in view of this background knowledge. This would include, for
 3 example:

- 4 • Cascading Style Sheets, level 1, W3C Recommendation 17 Dec 1996, revised 11 Jan
 5 1999, which was published by W3C at least as early as January 11, 1999 and
 6 constitutes prior art to the asserted patents under at least 35 U.S.C. §§ 102(a)/(b).
- 7 • Cascading Style Sheets, level 1, W3C Recommendation 17 Dec 1996, which was
 8 published by W3C at least as early as December 17, 1996 and constitutes prior art to
 9 the asserted patents under at least 35 U.S.C. §§ 102(a)/(b).
- 10 • Cascading Style Sheets, level 2 CSS2 Specification, W3C Recommendation 12-May-
 11 1998, which was published by W3C at least as early as May 12, 1998 and constitutes
 12 prior art to the asserted patents under at least 35 U.S.C. §§ 102(a)/(b).
- 13 • Standard ECMA-262, published by ECMA at least as early as June 1997 and
 14 constitutes prior art to the asserted patents under at least 35 U.S.C. §§ 102(a)/(b).
- 15 • Standard ECMA-262 2nd Edition, published by ECMA at least as early as August
 16 1998 and constitutes prior art to the asserted patents under at least 35 U.S.C. §§
 17 102(a)/(b).
- 18 • Standard ECMA-262 3rd Edition, published by ECMA at least as early as December
 19 1999 and on information and belief constitutes prior art to the asserted patents under
 20 at least 35 U.S.C. §§ 102(a)/(b).
- 21 • James Gosling, Bill Joy, and Guy Steele, *The Java Language Specification*, published
 22 by Addison-Wesley, Copyright Sun Microsystems, Inc., which was published at least
 23 as early as 1996 and constitutes prior art to the asserted patents under at least 35
 24 U.S.C. §§ 102(a)/(b).
- 25 • Lisa Friendly and Bill Joy, *The Java Virtual Machine Specification*, published by
 26 Addison-Wesley, Copyright Sun Microsystems, Inc., which was published at least as
 27 early as 1997 and constitutes prior art to the asserted patents under at least 35 U.S.C.
 28 §§ 102(a)/(b).

- 1 • HTML 3.2 Reference Specification, W3C Recommendation 14-Jan-1997, which is a
2 specification for HTML 3.2 published by W3C at least as early as January 14, 1997
3 and which constitutes prior art to the asserted patents under at least 35 U.S.C. §§
4 102(a)/(b).
- 5 • HTML 4.0 Specification, W3C Recommendation, revised on 24-Apr-1998, which is a
6 specification for HTML 4.0 published by W3C at least as early as April 24, 1998 and
7 which constitutes prior art to the asserted patents under at least 35 U.S.C. §§
8 102(a)/(b).

9 Additionally, some pieces of prior art refer to or discuss other pieces of prior art,
10 illustrating the close technical relationship among the prior art. *See, e.g.*, U.S. Patent Pub.
11 No. 2002/0091725 (“Skok”) ¶ 35 (referencing Netscape Composer). To the extent that any
12 piece of prior art refers to or discusses another piece of prior art or the contents of such prior
13 art, either expressly, impliedly, or inherently, it would have been obvious to combine those
14 pieces of prior art for at least that reason.

15 As shown above, the industry had developed and was continuing to develop easy-to-
16 use and full-featured WYSIWYG website creation and display tools. Indeed, design
17 incentives and other market forces would have prompted combinations and modifications of
18 the prior art. Design needs and market pressures provide ample reason to combine prior art
19 elements in the manner combined. *See KSR v. Teleflex*, 127 S. Ct. 1727, 1742 (2007).

20 Moreover, the Asserted Claims are also obvious because they merely arrange old and
21 known elements, with each performing the same function that had been known, to perform
22 and yield no more than what one having ordinary skill in the art would expect from such an
23 arrangement. A person skilled in the art of website design and creation would have been
24 familiar with all the claim elements to the extent enabled, adequately disclosed, and not
25 indefinite. The identified prior art references merely use those familiar elements for their
26 primary or well-known purposes and in a manner well within the ordinary level of skill in the
27 art. Accordingly, common sense and the knowledge of one having ordinary skill in the art
28 render the Asserted Claims invalid. Other motivations to combine the prior art are discussed

1 throughout these Invalidity Contentions and will be further discussed during the expert report
2 and discovery phase of this litigation.

3 Although certain pieces of prior art are listed as evidence for particular prior art
4 systems, certain of those pieces of prior art describe, relate to, and are evidence of other prior
5 art systems that also render the Asserted Claims invalid. Magento reserves the right to rely
6 on any identified piece of prior art as evidence supporting any of those other prior art
7 solutions.

8 To the extent that Express Mobile argues that a piece of prior art does not disclose an
9 element or challenges a combination of prior art identified by Magento, Magento reserves the
10 right to supplement these Invalidity Contentions to address that argument or challenge, since
11 it is unknown to Magento at this time. Magento may rely on any combination of the prior art
12 disclosed in these Invalidity Contentions, including the combinations outlined in Appendix A
13 and the Exhibits hereto, the knowledge of those skilled in the art, and/or other prior art to
14 show that it would have been obvious to include the allegedly missing element or to further
15 buttress the motivation to combine the prior art.

16 In addition to the prior art identified below and the accompanying invalidity claim
17 charts, Magento also relies on the “Background” and other portions of the Patents-in-Suit, the
18 prosecution histories of the Patents-in-Suit (including the references cited therein) and the
19 prosecution histories of related patents including the disclosures and admissions therein, fact
20 and expert testimony about the prior art, and publications of the alleged inventors of the
21 Patents-in-Suit, to show that the Asserted Claims are anticipated and/or rendered obvious
22 under 35 U.S.C. §§ 102 and 103, or are otherwise invalid.

23 In addition to the prior art that is set forth in the charts in Exhibits hereto, additional
24 prior art references are being produced concurrently with these Invalidity Contentions. This
25 additional art may be relevant to the validity of the asserted claims depending on the
26 positions taken by Express Mobile, and in any event may be referenced to show the state and
27 evolution of technology in these fields. Accordingly, for the foregoing reasons, Magento
28 reserves the right to supplement these Invalidity Contentions with specific claim charts and

obviousness combinations with the additional references based on the allegations and contentions asserted by Express Mobile as these allegations and corresponding constructions of the claims become clear.

Each disclosed item of prior art is evidence of a prior invention and making of the invention in the United States by another under 35 U.S.C. § 102(g), as evidenced by the named inventor, authors, organizations, and publishers involved with each such reference, with the circumstances described and reflected in each reference including publications and system implementation references.

These Invalidity Contentions are based on Magento's current knowledge of the Patents-in-Suit, the prior art, and Express Mobile's Infringement Contentions. Magento's investigation regarding invalidity of the Patents-in-Suit over prior art and regarding other grounds of invalidity, including those based on public use or on-sale bar under 35 U.S.C. § 102(b), anticipation under 35 U.S.C. § 102, obviousness under 35 U.S.C. § 103, and failure to comply with 35 U.S.C. § 112, is ongoing. Magento specifically reserves the right to modify, amend, or supplement these disclosures in accordance with Patent L.R. 3-6. Magento further reserves the right to rely upon the facts, evidence, and arguments advanced in the Expert Report of Chris Schmandt Regarding Invalidity of Asserted Claims, *Express Mobile LLC v. Svanaco, Inc.*, No. 2:17-cv-130-JRG (E.D. Tex.) and exhibits thereto in support of invalidity of the '397 and '168 patent claims.

A. U.S. Patent No. 6,546,397

1. Patent L.R. 3-3(a), (b), and (c)

Table 1, below, identifies invalidity claim charts included as exhibits to these contentions that outline specific examples of where the limitations of the Asserted Claims of the '397 Patent are found in that reference ("the '397 Exhibits"). Magento also relies on, and incorporates by reference, the prior art references cited in the prosecution history of the '397 and '168 Patents. Appendix A lists prior art references that anticipate, and combinations of prior art reference(s) that render obvious, and thus invalidate, various claims of the '397 Patent.

The Appendix and Exhibits are expressly part of these Invalidity Contentions and are provided in satisfaction of the requirements of Patent Local Rules 3-3(a), (b) and (c). The portions of the prior art cited in the charts are not exhaustive but are exemplary in nature. These invalidity assertions are not an admission by Magento that any of the accused products are covered by or infringe these claims, particularly when these claims are properly construed. These invalidity assertions are not an admission that Magento concedes any claim construction implied or suggested by Express Mobile's Complaint or Infringement Contentions. Nor is Magento taking any claim construction positions through these charts, including whether the preamble is limiting. As set forth herein, the asserted claims of the '397 patent are invalid as anticipated under 35 U.S.C. § 102 or rendered obvious under 35 U.S.C. § 103 in view of each of the prior art references listed in Appendix A and addressed in the '397 Exhibits.

Table 1 – List of Prior Art Systems and References That Anticipate or Render Obvious Each Asserted Claim of the '397 Patent Pursuant to Patent L.R. 3-3(a)

Exhibit Number	Prior Art
397-1	<p>Netscape Communicator is a set of tools for developing web sites on the internet that was offered for sale by Netscape Communications Corp. and publicly available at least as early as 1997, and is therefore prior art to the '397 patent at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Netscape Composer for Dummies is a reference book for using Netscape Communicator to build websites, authored by Deborah S. Ray and Eric J. Ray, and published by IDG Books Worldwide at least as early as 1997, and is therefore prior art to the '397 patent at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Netscape Navigator Gold 3 Deluxe Edition is a reference book for using Netscape Navigator Gold to build websites, authored by Laura Lemay and published by Sams.net Publishing at least as early as 1997, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>The aforementioned prior art systems are themselves prior art. References describing these systems constitute disclosure of the prior art systems as well as</p>

Exhibit Number	Prior Art
	constituting prior art independently.
397-2	<p>NetObjects Fusion 4.0 is software for developing web sites on the internet that was offered for sale by NetObjects, Inc. and publicly available at least as early as 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>NetObjects Fusion 4.0 User Guide is a reference guide for using NetObjects Fusion 4.0 to build websites, published by NetObjects Inc. at least as early as 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>NetObjects Dynamic Pages is a reference guide and was published, on information and belief, by NetObjects Inc. at least as early as 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>NetObjects Fusion Dynamic Actions Reference is a reference guide for using NetObjects Fusion 4.0 to build websites, published by NetObjects Inc. at least as early as 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>The aforementioned prior art systems are themselves prior art. References describing these systems constitute disclosure of the prior art systems as well as constituting prior art independently.</p>
397-3	<p>U.S. Patent Publication No. 2002/0091725, entitled “Method and apparatus for providing client-based web page content creation and management,” was filed on May 12, 1998 and published on June 11, 2002, and is therefore prior art at least under 35 U.S.C. § 102(e).</p>
397-4	<p>U.S. Patent No. 6,185,587, entitled “System and method for building a web site with automated help,” was filed on June 19, 1998, claims priority to Provisional Application Nos. 60/050153 and 60/050154 filed on June 19, 1997, and issued on April 8, 2003, and is therefore prior art at least under 35 U.S.C. § 102(e).</p>
397-5	<p>U.S. Patent No. 6,313,835, entitled “Simplified on-line preparation of dynamic web sites,” was filed on April 9, 1999, and issued on November 6, 2001, and is therefore prior art at least under 35 U.S.C. § 102(e).</p>
397-6	<p>U.S. Patent No. 6,396,500, entitled “Method and system</p>

Exhibit Number	Prior Art
	for generating and displaying a slide show with animations and transitions in a browser,” was filed on March 8, 1999 and issued on May 28, 2002, and is therefore prior art at least under 35 U.S.C. § 102(e).
397-7	U.S. Patent No. 6,230,174 , entitled “Method of generating a markup language document containing image slices,” was filed on September 11, 1998 and issued on May 8, 2001, and is therefore prior art at least under 35 U.S.C. § 102(e).
397-8	U.S. Patent No. 6,141,018 , entitled “Method and system for displaying hypertext documents with visual effects,” was filed on March 12, 1997 and issued on October 31, 2000, and is therefore prior art at least under 35 U.S.C. § 102(e).
397-9	U.S. Patent No. 6,369,821 , entitled “Method and system for synchronizing scripted animations,” was filed on February 26, 1998, claims priority to U.S. Patent Application No. 08/858,648 filed on May 19, 1997, and issued on April 9, 2002, and is therefore prior art at least under 35 U.S.C. § 102(e).
397-10	<p>SilverStream System is a software platform for developing web sites on the internet that was offered for sale by SilverStream and publicly available at least as early as February 14, 1998, and is therefore prior art to the ’397 patent at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>SilverStream 2.0 is an article disclosing the use of JAR files in the SilverStream application by Chris Minnick, published at least as early as July 1, 1999 on www.drdoobs.com, and on information and belief is therefore prior art to the ’397 patent at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>The aforementioned prior art systems are themselves prior art. References describing these systems constitute disclosure of the prior art systems as well as constituting prior art independently.</p>
397-11	<p>GeoCities is a web hosting service that provided various webpage creation tools, including GeoBuilder, which was made publicly available by GeoCities at least as early as fall of 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Creating GeoCities Websites is a reference book for</p>

Exhibit Number	Prior Art
	<p>using Geocities to build websites, authored by Ben Sawyer and Dave Greely, published by Muska & Lipman Publishing, and made publicly available at least as early as March 1, 1999, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>The aforementioned prior art systems are themselves prior art. References describing these systems constitute disclosure of the prior art systems as well as constituting prior art independently.</p>
397-12	<p>U.S. Patent No. 6,343,302, entitled “Remote Web Site Authoring System and Method,” was filed on February 13, 1997 and issued on January 29, 2002, and is therefore prior art at least under 35 U.S.C. § 102(e).</p>
397-13	<p>A Visual Programming Tool for User Interface and Web Page Generation is a paper disclosing a Web-based application for building web pages by Zhengbin Yan and Kang Zhang, published at the Technology of Object-Oriented Languages Conference at least as early as September 22-25, 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p>
397-14	<p>Cospace: Combining Web Browsing and Dynamically Generated, 3D, Multiuser Environments is a paper disclosing the construction of dynamic 3D environments in Virtual Reality Modeling Language by Peter Selfridge and Thomas Kirk, published in Intelligence at least as early as Spring 1999, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p>
397-15	<p>U.S. Patent No. 6,175,842, entitled “System and Method for Providing Three-Dimensional Multi-User Virtual Spaces in Synchrony with Hypertext Browsing,” was filed on July 3, 1997 and issued on January 16, 2001, and is therefore prior art at least under 35 U.S.C. § 102(e).</p>
397-16	<p>Intellect: A System for Authoring, Distributing, and Presenting Multimedia Contents Over the Internet is a paper disclosing a platform for multimedia content development by Soung C. Liew, et al., published at the IEEE International Conference on Multimedia Computing and Systems at least as early as June 7-11, 1999, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p>

Exhibit Number	Prior Art
397-17	<p>Visual Preview for Link Traversal on the World Wide Web is a paper disclosing a link preview service using standard Web browsing software by Theodorich Kopetzky and Max Mühlhäuser, published in Computer Networks at least as early as May 1999, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p>
397-18	<p>Towards the Virtual Internet Gallery is a paper disclosing a Virtual Internet Gallery using databases and Virtual Reality Modeling Language by Andreas Müller, et al., published at the IEEE International Conference on Multimedia Computing and Systems at least as early as June 7-11, 1999, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p>
397-19	<p>Amaya is a system for web page browsing and authoring, made publicly available and/or on sale by W3C at least as early as February 20, 1997, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>An Introduction to Amaya is a paper disclosing a browser and WYSIWYG authoring tool for creating Web pages by Vincent Quint and Irene Vatton, published by the W3 Consortium at least as early as February 20, 1997, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Amaya Browsing is a webpage disclosing Amaya's features, available at w3.org:80/pub/WWW/Amaya/User/Browsing.html at least as early as June 7, 1997, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Amaya Views is a webpage disclosing Amaya's features, available at w3.org:80/pub/WWW/Amaya/User/Views.html at least as early as June 7, 1997, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Amaya Attributes is a webpage disclosing Amaya's features, available at w3.org:80/pub/WWW/Amaya/User/Attributes.html at least as early as August 2, 1997, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Amaya Creating is a webpage disclosing Amaya's</p>

Exhibit Number	Prior Art
	<p>features, available at w3.org:80/pub/WWW/Amaya/User/creating.html at least as early as June 7, 1997, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Amaya Homepage is a webpage disclosing Amaya's viewing features, available at w3.org:80/pub/WWW/Amaya at least as early as July 3, 1998, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>The aforementioned prior art Amaya system is itself prior art. References describing Amaya constitute disclosure of the prior art systems as well as constituting prior art independently.</p>
397-20	<p>Amaya: an Authoring Tool for the Web is a paper disclosing a browser and WYSIWYG authoring tool for creating Web pages by Ramzi Guetari, Vincent Quint, and Irene Vatton, published at the Proceedings of the 5th Maghrebian Conference on Software Engineering and Artificial Intelligence in 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Amaya is a system for web page browsing and authoring, made publicly available and/or on sale by W3C at least as early as February 20, 1997, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>The aforementioned prior art Amaya system is itself prior art. References describing Amaya constitute disclosure of the prior art systems as well as constituting prior art independently.</p>
397-21	<p>Building Interactive Animations using VRML and Java is a paper disclosing the construction of highly interactive animations in Virtual Reality Modeling Language by Fabiana Tamiosso, et al., published at the Brazilian Symposium on Computer Graphics and Image Processing at least as early as October 14-17, 1997, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p>
397-22	<p>Wireless-adaptation of WWW content over CDMA is a paper disclosing lossless data compression and reauthoring of HTML documents by K. Ham, et al.,</p>

Exhibit Number	Prior Art
	published at the IEEE International Workshop on Mobile Multimedia Communications at least as early as November 15-17, 1999, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).
397-23	Constraint Cascading Style Sheets for the Web is a paper disclosing the use of constraint-based style sheets for controlling the appearance of HTML documents by Greg Badros, et al., published in the Technical Report UW CSE at least as early as May 7, 1999, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).
397-24	Web Content Delivery to Heterogeneous Mobile Platforms is a paper disclosing a method for developing web content adapted to mobile platforms by Martin Gaedke, Michael Beigl, Hans-Werner Gellersen, and Christian Segor, published at the Proceedings of the Workshops on Data Warehousing and Data Mining: Advances in Database Technologies at least as early as November 19-20, 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).
397-25	Java Archives in Java 1.2 is an article disclosing the use of Java archive files in Java 1.2 by William Robert Stanek, published in PC Magazine at least as early as February 23, 1999, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).
397-26	Java in a Nutshell: A Desktop Quick Reference for Java Programmers (2d ed.) is a reference book disclosing common features of Java 1.1, authored by David Flanagan, published by O'Reilly Media, and made publicly available at least as early as May 11, 1997, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b). Java and the Java Virtual Machine are themselves prior art under at least 35 U.S.c. § 102(a) and/or (b). References describing Java and the Java Virtual Machine constitute disclosure of the prior art systems as well as constituting prior art independently.
397-27	U.S. Patent No. 5,842,020 , entitled "System, method and article of manufacture for providing dynamic user editing of object oriented components used in an object

Exhibit Number	Prior Art
	oriented applet or application,” was filed on January 31, 1997, and issued on November 4, 1998, and is therefore prior art at least under 35 U.S.C. § 102(e).
397-28	PCT International Patent Publication WO 98/20434 , entitled “System and method for displaying information and monitoring communications over the internet,” was filed on October 30, 1997, and was published on May 14, 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).
397-29	<p>FrontPage 2000 is software for developing web sites on the internet that was offered for sale by Microsoft Corp. and publicly available at least as early as 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Special Edition Using FrontPage 2000 is a reference guide for using FrontPage 2000 to build websites by Neil Randall and Dennis Jones, published by Que at least as early as May 1999, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>The aforementioned prior art systems are themselves prior art. References describing these systems constitute disclosure of the prior art systems as well as constituting prior art independently.</p>
397-30	Tip 80: Resize Applets Within Browser Frames is an article disclosing a method for dynamic resizing of applets within browser frames for optimal display by Francis Lu, published at least as early as October 5, 1999 by JavaWorld, and on information and belief is therefore prior art to the ‘397 patent at least under 35 U.S.C. § 102(a) and/or (b).
397-31	Adapting Multimedia Internet Content for Universal Access is a paper disclosing a system for adapting multimedia Web documents for optimal display on diverse client platforms by Rakesh Mohan, John R. Smith, and Chung-Sheng Li., published in the IEEE Transactions on Multimedia at least as early as March 1999, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).
397-32	SilverStream Authorized Guide is a book by Howard M. Block and Albert J. Dunn that was published in 1998. It describes SilverStream 1.5, including as it existed in

Exhibit Number	Prior Art
	<p>September 1998 and December 1998. In addition to describing SilverStream 1.5 (and, by extension, SilverStream 1.0/2.0), SilverStream Authorized Guide is itself a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream 1.5 CD is a CD enclosed with the SilverStream Authorized Guide, and was thus on-sale and published in 1998. <i>See</i> XMO_MAG006740 at 7305 (picture of SilverStream 1.5 CD enclosed with SilverStream Authorized Guide).</p> <p>SilverStream 1.5 CD contains a demo version of SilverStream 1.5 as it existed no later than September 1998. Skok Deposition at 26:12-29:17. It also contains product documentation for SilverStream 1.5. Skok Deposition at 26:12-29:17.</p> <p>SilverStream 1.5 CD is thus an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b). The documentation on the CD is also prior art and a printed publication under 35 U.S.C. § 102(a)/(b). The description of SilverStream Authorized Guide is evidence of the functionality provided by the SilverStream 1.5 CD.</p>
397-33	<p>SilverStream Tutorial (Nov. 1997) is a guide that was distributed with SilverStream 1.0 software. Skok Deposition at 31:20-35:23. It describes SilverStream 1.0 as it existed in 1997. Skok Deposition at 34:4-15, 39:20-40:8.</p> <p>It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream Programmer's Guide (Nov. 1997) is a guide that was distributed with SilverStream 1.0 software. Skok Deposition at 31:20-35:23. It describes SilverStream 1.0 as it existed in 1997. Skok Deposition at 34:4-15, 39:20-40:8.</p> <p>It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream Programmer's Guide (Sept. 1998) is a guide that was distributed with SilverStream software.</p>

Exhibit Number	Prior Art
	<p>It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream Administration Guide (Nov. 1997) is a guide that was distributed with SilverStream 1.0 software. Skok Deposition at 31:20-35:23. It describes SilverStream 1.0 as it existed in 1997. Skok Deposition at 34:4-15, 39:20-40:8.</p> <p>It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream Administration Guide (Sept. 1998) is a guide that was distributed with SilverStream software. It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>The SilverStream Guides all describe the prior art SilverStream system and are properly considered both as separate prior art references and together as a single prior art reference, or as any combination thereof.</p>
397-34	<p>SilverStream System SilverStream is a software platform that was on sale by SilverStream and in public use prior to the alleged invention. For example, SilverStream 1.0 was on sale by SilverStream and in public use no later than November 1997. Skok Deposition at 31:10-40:14; SilverStream Authorized Guide at v. SilverStream 1.5 is an incremental upgrade to SilverStream 1.0 that was on sale by SilverStream and in public use no later than September 1998. Skok Deposition at 40:9-23. SilverStream 1.5 was described in the SilverStream Authorized Guide book, which included a SilverStream 1.5 CD. Skok Deposition at 14:41-29:10. A further version, SilverStream 2.0, was on sale by SilverStream and in public use no later than 1998. SilverStream (including each of versions 1.0, 1.5, and 2.0) thus qualifies as prior art to the '397 patent under 35 U.S.C. § 102(a) and/or (b).</p>

Exhibit Number	Prior Art
	<p>The aforementioned prior art systems are themselves prior art. References describing these systems constitute disclosure of the prior art systems as well as constituting prior art independently.</p> <p>The SilverStream system is described in various documents, referenced below (“the SilverStream Prior Art”). Aside from disclosing the functionality of the publicly available and on-sale SilverStream system, these documents are themselves prior art that anticipate and/or render obvious the asserted claims of the ’397 patent. Documents describing SilverStream 1.5 are also evidence of the functionality provided by SilverStream 1.0 and SilverStream 2.0 (and any intervening incremental versions). More generally, functionality of SilverStream 1.5 is evidence of the functionality of SilverStream 1.0 and 2.0, and vice versa. Skok Deposition at 40:9-23.</p> <p>SilverStream 2.0 is an article disclosing the use of JAR files in the SilverStream application by Chris Minnick, published at least as early as July 1, 1999 on www.drdoobbs.com, and on information and belief is therefore prior art to the ’397 patent at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>SilverStream Product Demonstration is a collection of webpages made available online by SilverStream. The documents were publicly available on SilverStream’s website no later than February 14, 1998 as reflected in the archive.org URL, and further reflect SilverStream software functionality that existed in 1998. Skok Deposition at 9:12-12:14, 31:4-11.</p> <p>The SilverStream Product Demonstration is thus prior art under 35 U.S.C. § 102(a)/(b) and evidence of the functionality of SilverStream 1.0, 1.5, and 2.0.</p> <p>SilverStream Authorized Guide is a book by Howard M. Block and Albert J. Dunn that was published in 1998. It describes SilverStream 1.5, including as it existed in September 1998 and December 1998. In addition to describing SilverStream 1.5 (and, by extension, SilverStream 1.0/2.0), SilverStream Authorized Guide is itself a printed publication and prior art under 35</p>

Exhibit Number	Prior Art
	<p data-bbox="646 289 906 321">U.S.C. § 102(a)/(b).</p> <p data-bbox="602 369 1333 579">SilverStream Application Server Sampler Version 1.5 (“SilverStream 1.5 CD”) is a CD enclosed with the SilverStream Authorized Guide, and was thus on-sale and published in 1998. <i>See</i> XMO_MAG006740 at 7305 (picture of SilverStream 1.5 CD enclosed with SilverStream Authorized Guide).</p> <p data-bbox="602 596 1360 774">SilverStream 1.5 CD contains a demo version of SilverStream 1.5 as it existed no later than September 1998. Skok Deposition at 26:12-29:17. It also contains product documentation for SilverStream 1.5. Skok Deposition at 26:12-29:17.</p> <p data-bbox="602 789 1360 1037">SilverStream 1.5 CD is thus an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b). The documentation on the CD is also prior art and a printed publication under 35 U.S.C. § 102(a)/(b). The description of SilverStream Authorized Guide is evidence of the functionality provided by the SilverStream 1.5 CD.</p> <p data-bbox="602 1096 1338 1383">U.S. Patent Pub. No. 2002/0091725 (“Skok”) was filed on May 12, 1998 and is therefore prior art to the ’397 patent under at least 35 U.S.C. §102(e). Skok is a patent directed to, and describes functionality of, SilverStream software as it existed in May 1998 and December 1998. Skok Deposition at 12:16-13:22, 31:4-11. Skok is also evidence of the functionality of SilverStream 1.0, 1.5, and 2.0.</p> <p data-bbox="602 1442 1360 1730">U.S. No. 6,209,029 (“Epstein”) was filed on May 12, 1998 and issued as a patent on March 27, 2001. Epstein is therefore prior art under at least 35 U.S.C. § 102(e). Epstein is directed to, and describes functionality of, SilverStream in or around May 1998 and December 1998. Skok Deposition at 29:21-31:11. Epstein is also evidence of the functionality of SilverStream 1.0, 1.5, and 2.0.</p> <p data-bbox="602 1789 1338 1959">U.S. Patent No. 6,880,129 (“Lee”) was filed on April 20, 2000 and issued as a patent on April 12, 2005. Lee claims priority to U.S. Provisional Patent Application No. 60/131,823, which was filed on April 29, 1999. Lee describes a subset of SilverStream functionality</p>

Exhibit Number	Prior Art
	<p>that existed in or around April 1999. Skok Deposition at 48:19-49:17.</p> <p>Lee is therefore prior art under at least 35 U.S.C. § 102(e). Lee is also evidence of the functionality of SilverStream 1.0, 1.5, and 2.0.</p> <p>The SilverStream Web Application Platform (“SilverStream White Paper”) is a white paper describing SilverStream version 1.0 as it was distributed in 1997. Skok Deposition at 36:1-39:19. It is prior art under 35 U.S.C. § 102(a)/(b) and is evidence of the functionality of SilverStream 1.0, 1.5, and 2.0.</p> <p>SilverStream 1.0 Starter Pack is a starter package for SilverStream 1.0 as it was sold in the third to fourth quarter of 1997. Skok Deposition at 31:20-35:23, 39:20-40:8.</p> <p>SilverStream 1.0 Starter Pack includes a CD containing the SilverStream 1.0 CD (XMO_MAG006739), the SilverStream Tutorial (Nov. 1997) (XMO_MAG007307), the SilverStream Administration Guide (Nov. 1997) (XMO_MAG008280), the SilverStream Programmer’s Guide (Nov. 1997) (XMO_MAG008405), and the SilverStream Installation Guide (Nov. 1997).</p> <p>SilverStream 1.0 Starter Pack is thus both an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b). Documentation on the CD and the paper documentation is also a printed publication and prior art under 35 U.S.C. § 102(a)/(b), alone and in combination.</p> <p>SilverStream 1.0 CD is a CD included with the SilverStream Starter Pack product packaging containing version 1.0 of SilverStream as it was sold in the third to fourth quarter of 1997. Skok Deposition at 31:20-35:25, 39:20-40:8.</p> <p>SilverStream 1.0 CD is thus evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b). Documentation on the CD is also prior art and a printed publication under 35 U.S.C. § 102(a)/(b).</p>

Exhibit Number	Prior Art
	<p data-bbox="602 331 1279 401">SilverStream 1.0a Sampler CD is a sample copy of SilverStream 1.0 software distributed in 1997.</p> <p data-bbox="602 457 1360 638">It is thus evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b). Documentation on the CD is also prior art and a printed publication under 35 U.S.C. § 102(a)/(b).</p> <p data-bbox="602 695 1279 764">SilverStream 1.0b Sampler CD is a sample copy of SilverStream 1.0 software distributed in 1997.</p> <p data-bbox="602 821 1360 1001">It is thus evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b). Documentation on the CD is also prior art and a printed publication under 35 U.S.C. § 102(a)/(b).</p> <p data-bbox="602 1010 1338 1190">SilverStream Tutorial (Nov. 1997) is a guide that was distributed with SilverStream 1.0 software. Skok Deposition at 31:20-35:23. It describes SilverStream 1.0 as it existed in 1997. Skok Deposition at 34:4-15, 39:20-40:8.</p> <p data-bbox="602 1199 1360 1310">It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p data-bbox="602 1360 1365 1541">SilverStream Programmer's Guide (Nov. 1997) is a guide that was distributed with SilverStream 1.0 software. Skok Deposition at 31:20-35:23. It describes SilverStream 1.0 as it existed in 1997. Skok Deposition at 34:4-15, 39:20-40:8.</p> <p data-bbox="602 1549 1360 1661">It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p data-bbox="602 1711 1344 1780">SilverStream Programmer's Guide (Sept. 1998) is a guide that was distributed with SilverStream software.</p> <p data-bbox="602 1837 1360 1948">It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p>

Exhibit Number	Prior Art
	<p>SilverStream Administration Guide (Nov. 1997) is a guide that was distributed with SilverStream 1.0 software. Skok Deposition at 31:20-35:23. It describes SilverStream 1.0 as it existed in 1997. Skok Deposition at 34:4-15, 39:20-40:8.</p> <p>It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream Administration Guide (Sept. 1998) is a guide that was distributed with SilverStream software. It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream INSIDE LOOK Beta 2 Version CD is a CD containing a 45-day evaluation beta version of SilverStream 2.0 in 1999. Skok Deposition 52:2-55:25.</p> <p>It is thus evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b). Documentation on the CD is also prior art and a printed publication under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream 2.0 Application Server is a packaged version of SilverStream 2.0 on sale in 1998. Skok Deposition at 49:22-51:2.</p> <p>On information and belief, SilverStream 2.0 Application Sever includes the SilverStream Administration Guide (Sept. 1998) and the SilverStream Programmer's Guide (Sept. 1998).</p> <p>SilverStream 2.0 Application Server is thus both an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b).</p>

Table 1 identifies the prior art references pursuant to Patent L.R. 3-3(a). These disclosures are made based on information currently known and appreciated by Magento, and are subject to further supplementation or amendment as discovery continues.

1 In accordance with Patent L.R. 3-3(b), the Exhibits hereto include invalidating prior
2 art references that render obvious one or more of the Asserted Claims of the '397 Patent.
3 Appendix A lists prior art references that anticipate, and combinations of prior art
4 reference(s) that render obvious, and thus invalidate, various claims of the '397 Patent.
5 These specific combinations are exemplary. In addition to the specific combinations of prior
6 art and the specific combinations of groups of prior art disclosed herein, Magento reserves
7 the right to rely on any combination of any prior art references disclosed herein.

8 Magento asserts that the references discussed in the '397 Exhibits anticipate various
9 asserted claims of the '397 Patent, and in particular, any claim for which a reference is
10 asserted to disclose all elements of the claim. If it is determined that some element of a given
11 claim is not disclosed in an anticipation reference, however, Magento contends in the
12 alternative that the anticipation reference in combination with one or more references
13 identified in Appendix A, or with the knowledge and skill of a person of ordinary skill in the
14 art at the time of the invention, would have rendered that claim obvious.

15 As discussed above in Section III and below, and as will be further discussed during
16 the expert report and discovery phase of the litigation, the motivation to combine the
17 teachings of the patents and other prior art referenced above is found in the art as specified in
18 the '397 Exhibits and in, for example: (1) the nature of the problem being solved, (2) the
19 express, implied and inherent teachings of the prior art, (3) the knowledge of persons of
20 ordinary skill in the art; (4) the fact that the prior art is generally directed towards website
21 creation, often in the more specific field of WYSIWYG editors, and often in the even more
22 specific context of browser-based WYSIWYG editors; and (5) the predictable results
23 obtained in combining the different elements of the prior art. The Supreme Court has held
24 that a showing of a motivation to combine within the references themselves is not required to
25 prove obviousness. *KSR v. Teleflex*, 127 S. Ct. 1727, 1724 (2007) ("Any need or problem
26 known in the field of endeavor at the time of invention may provide the motivation to
27 combine.").

B. U.S. Patent No. 7,594,168

1. Patent L.R. 3-3(a), (b), and (c)

Table 1, below, identifies invalidity claim charts included as exhibits to these contentions that outline specific examples of where each limitation of one or more of the asserted claims of the '168 Patent is found in that reference ("the '168 Exhibits"). Magento also relies on, and incorporates by this reference, the prior art references cited in the prosecution history of the '168 and '397 Patents. Appendix A lists combinations of prior art reference(s) that anticipate, and combinations of prior art reference(s) that render obvious, and thus invalidate, various claims of the '168 Patent.

The Appendix and Exhibits are expressly part of these Invalidity Contentions and are provided in satisfaction of the requirements of Patent Local Rules 3-3(a), (b) and (c). The portions of the prior art cited in the charts are not exhaustive but are exemplary in nature. These invalidity assertions are not an admission by Magento that the accused products (including any current or past version of these products) are covered by or infringe these claims, particularly when these claims are properly construed. These invalidity assertions are not an admission that Magento concedes any claim construction implied or suggested by Express Mobile's Complaint or Infringement Contentions. Nor is Magento taking any claim construction positions through these charts, including whether the preamble is limiting. As set forth herein, the asserted claims of the '168 patent are invalid as anticipated under 35 U.S.C. § 102 or rendered obvious under 35 U.S.C. § 103 in view of each of the prior art references listed in Appendix A and addressed in the '397 Exhibits.

Table 2 – List of Prior Art Systems and References That Anticipate or Render Obvious Each Asserted Claim of the '168 Patent Pursuant to Patent L.R. 3-3(a)

Exhibit Number	Prior Art
168-1	<p>Netscape Communicator is a set of tools for developing web sites on the internet that was offered for sale by Netscape Communications Corp. and publicly available at least as early as 1997, and is therefore prior art to the '397 patent at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Netscape Composer for Dummies is a reference book for</p>

Exhibit Number	Prior Art
	<p>using Netscape Communicator to build websites, authored by Deborah S. Ray, et al., and published by IDG Books Worldwide at least as early as 1997, and is therefore prior art to the '397 patent at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Netscape Navigator Gold 3 Deluxe Edition is a reference book for using Netscape Navigator Gold to build websites, authored by Laura Lemay and published by Sams.net Publishing at least as early as 1997, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>The aforementioned prior art systems are themselves prior art. References describing these systems constitute disclosure of the prior art systems as well as constituting prior art independently.</p>
168-2	<p>NetObjects Fusion 4.0 is a software for developing web sites on the internet that was offered for sale by NetObjects, Inc. and publicly available at least as early as 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>NetObjects Fusion 4.0 User Guide is a reference guide for using NetObjects Fusion 4.0 to build websites, published by NetObjects Inc. at least as early as 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>NetObjects Dynamic Pages is a reference guide and was published, on information and belief, by NetObjects Inc. at least as early as 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>NetObjects Fusion Dynamic Actions Reference is a reference guide for using NetObjects Fusion 4.0 to build websites, published by NetObjects Inc. at least as early as 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>The aforementioned prior art systems are themselves prior art. References describing these systems constitute disclosure of the prior art systems as well as constituting prior art independently.</p>
168-3	<p>SilverStream System is a software platform for developing web sites on the internet that was offered for sale by SilverStream and publicly available at least</p>

Exhibit Number	Prior Art
	<p>as early as February 14, 1998, and is therefore prior art to the '397 patent at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>SilverStream 2.0 is an article disclosing the use of JAR files in the SilverStream application by Chris Minnick, published at least as early as July 1, 1999 on www.drdoobs.com, and on information and belief is therefore prior art to the '397 patent at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>The aforementioned prior art systems are themselves prior art. References describing these systems constitute disclosure of the prior art systems as well as constituting prior art independently.</p>
168-4	<p>GeoCities is a web hosting service that provided various webpage creation tools, including GeoBuilder, which was made publicly available by GeoCities at least as early as fall of 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Creating GeoCities Websites is a reference book for using Geocities to build websites, authored by Ben Sawyer and Dave Greely, published by Muska & Lipman Publishing, and made publicly available at least as early as March 1, 1999, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>The aforementioned prior art systems are themselves prior art. References describing these systems constitute disclosure of the prior art systems as well as constituting prior art independently.</p>
168-5	<p>A Visual Programming Tool for User Interface and Web Page Generation is a paper disclosing a Web-based application for building web pages by Zhengbin Yan and Kang Zhang, published at the Technology of Object-Oriented Languages Conference as early as September 22-25, 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p>
168-6	<p>Cospace: Combining Web Browsing and Dynamically Generated, 3D, Multiuser Environments is a paper disclosing the construction of dynamic 3D environments in Virtual Reality Modeling Language by Peter Selfridge and Thomas Kirk, published in Intelligence as early as Spring 1999, and on</p>

Exhibit Number	Prior Art
	information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).
168-7	U.S. Patent No. 6,175,842 , entitled “System and Method for Providing Three-Dimensional Multi-User Virtual Spaces in Synchrony with Hypertext Browsing,” was filed July 3, 1997 and issued on January 16, 2001, and is therefore prior art at least under 35 U.S.C. § 102(e).
168-8	Intellect: A System for Authoring, Distributing, and Presenting Multimedia Contents Over the Internet is a paper disclosing a platform for multimedia content development by Soung C. Liew, et al., published at the IEEE International Conference on Multimedia Computing and Systems as early as June 7-11, 1999, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).
168-9	Visual Preview for Link Traversal on the World Wide Web is a paper disclosing a link preview service using standard Web browsing software by Theodorich Kopetzky and Max Mühlhäuser, published in Computer Networks as early as May 1999, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).
168-10	Towards the Virtual Internet Gallery is a paper disclosing a Virtual Internet Gallery using databases and Virtual Reality Modeling Language by Andreas Müller, et al., published at the IEEE International Conference on Multimedia Computing and Systems as early as June 7-11, 1999, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).
168-11	<p>Amaya is a system for web page browsing and authoring, made publicly available and/or on sale by W3C at least as early as February 20, 1997, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>An Introduction to Amaya is a paper disclosing a browser and WYSIWYG authoring tool for creating Web pages by Vincent Quint and Irene Vatton, published by the W3 Consortium at least as early as February 20, 1997, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Amaya Browsing is a webpage disclosing Amaya’s browsing features, available at</p>

Exhibit Number	Prior Art
	<p>w3.org:80/pub/WWW/Amaya/User/Browsing.html at least as early as June 7, 1997, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Amaya Views is a webpage disclosing Amaya's viewing features, available at w3.org:80/pub/WWW/Amaya/User/Views.html at least as early as June 7, 1997, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Amaya Attributes is a webpage disclosing Amaya's ability to edit attributes, available at w3.org:80/pub/WWW/Amaya/User/Attributes.html at least as early as August 2, 1997, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Amaya Creating is a webpage disclosing Amaya's ability to create elements, available at w3.org:80/pub/WWW/Amaya/User/creating.html at least as early as June 7, 1997, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Amaya Homepage is a webpage disclosing Amaya's viewing features, available at w3.org:80/pub/WWW/Amaya at least as early as July 3, 1998, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>The aforementioned prior art Amaya system is itself prior art. References describing Amaya constitute disclosure of the prior art systems as well as constituting prior art independently.</p>
168-12	<p>Amaya: an Authoring Tool for the Web is a paper disclosing a browser and WYSIWYG authoring tool for creating Web pages by Ramzi Guetari, et al., published at the Proceedings of the 5th Maghrebian Conference on Software Engineering and Artificial Intelligence as early as 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Amaya is a system for web page browsing and authoring, made publicly available and/or on sale by W3C at least as early as February 20, 1997, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p>

Exhibit Number	Prior Art
	The aforementioned prior art Amaya system is itself prior art. References describing Amaya constitute disclosure of the prior art systems as well as constituting prior art independently.
168-13	Java Archives in Java 1.2 is an article disclosing the use of Java archive files in Java 1.2 by William Robert Stanek, published in PC Magazine as early as February 23, 1999, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).
168-14	Java in a Nutshell: A Desktop Quick Reference for Java Programmers (2d ed.) is a reference book disclosing common features of Java 1.1, authored by David Flanagan, published by O'Reilly Media, and made publicly available at least as early as May 11, 1997, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b). Java and the Java Virtual Machine are themselves prior art under at least 35 U.S.c. § 102(a) and/or (b). References describing Java and the Java Virtual Machine constitute disclosure of the prior art systems as well as constituting prior art independently.
168-15	U.S. Patent Publication No. 2002/0091725 , entitled "Method and apparatus for providing client-based web page content creation and management," was filed on May 12, 1998 and published on June 11, 2002, and is therefore prior art at least under 35 U.S.C. § 102(e).
168-16	U.S. Patent No. 6,185,587 , entitled "System and method for building a web site with automated help," was filed on June 19, 1998, claims priority to Provisional Application Nos. 60/050153 and 60/050154 filed on June 19, 1997, and issued on April 8, 2003, and is therefore prior art at least under 35 U.S.C. § 102(e).
168-17	U.S. Patent No. 6,313,835 , entitled "Simplified on-line preparation of dynamic web sites," was filed on April 9, 1999, and issued on November 6, 2001, and is therefore prior art at least under 35 U.S.C. § 102(e).
168-18	U.S. Patent No. 6,343,302 , entitled "Remote Web Site Authoring System and Method," was filed on February 13, 1997 and issued on January 29, 2002, and is therefore prior art at least under 35 U.S.C. § 102(e).
168-19	U.S. Patent No. 6,396,500 , entitled "Method and system

Exhibit Number	Prior Art
	for generating and displaying a slide show with animations and transitions in a browser,” was filed on March 8, 1999 and issued on May 28, 2002, and is therefore prior art at least under 35 U.S.C. § 102(e).
168-20	<p>FrontPage 2000 is software for developing web sites on the internet that was offered for sale by Microsoft Corp. and publicly available at least as early as 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>Special Edition Using FrontPage 2000 is a reference guide for using FrontPage 2000 to build websites by Neil Randall, et al., published by Que at least as early as May 1999, and on information and belief is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>The aforementioned prior art systems are themselves prior art. References describing these systems constitute disclosure of the prior art systems as well as constituting prior art independently.</p>
168-21	PCT International Patent Publication WO 98/20434 , entitled “System and method for displaying information and monitoring communications over the internet,” was filed on October 30, 1997, and was published on May 14, 1998, and is therefore prior art at least under 35 U.S.C. § 102(a) and/or (b).
168-22	U.S. Patent No. 6,230,174 , entitled “Method of generating a markup language document containing image slices,” was filed on September 11, 1998 and issued on May 8, 2001, and is therefore prior art at least under 35 U.S.C. § 102(e).
168-23	U.S. Patent No. 6,141,018 , entitled “Method and system for displaying hypertext documents with visual effects,” was filed on March 12, 1997 and issued on October 31, 2000, and is therefore prior art at least under 35 U.S.C. § 102(e).
168-24	U.S. Patent No. 6,369,821 , entitled “Method and system for synchronizing scripted animations,” was filed on February 26, 1998, claims priority to U.S. Patent Application No. 08/858,648 filed on May 19, 1997, and issued on April 9, 2002, and is therefore prior art at least under 35 U.S.C. § 102(e).
168-25	U.S. Patent No. 5,842,020 , entitled “System, method and

Exhibit Number	Prior Art
	<p>article of manufacture for providing dynamic user editing of object oriented components used in an object oriented applet or application,” was filed on January 31, 1997, and issued on November 4, 1998, and is therefore prior art at least under 35 U.S.C. § 102(e).</p>
168-26	<p>SilverStream Authorized Guide is a book by Howard M. Block and Albert J. Dunn that was published in 1998. It describes SilverStream 1.5, including as it existed in September 1998 and December 1998. In addition to describing SilverStream 1.5 (and, by extension, SilverStream 1.0/2.0), SilverStream Authorized Guide is itself a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream 1.5 CD is a CD enclosed with the SilverStream Authorized Guide, and was thus on-sale and published in 1998. <i>See</i> XMO_MAG006740 at 7305 (picture of SilverStream 1.5 CD enclosed with SilverStream Authorized Guide).</p> <p>SilverStream 1.5 CD contains a demo version of SilverStream 1.5 as it existed no later than September 1998. Skok Deposition at 26:12-29:17. It also contains product documentation for SilverStream 1.5. Skok Deposition at 26:12-29:17.</p> <p>SilverStream 1.5 CD is thus an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b). The documentation on the CD is also prior art and a printed publication under 35 U.S.C. § 102(a)/(b). The description of SilverStream Authorized Guide is evidence of the functionality provided by the SilverStream 1.5 CD.</p>
168-27	<p>SilverStream Tutorial (Nov. 1997) is a guide that was distributed with SilverStream 1.0 software. Skok Deposition at 31:20-35:23. It describes SilverStream 1.0 as it existed in 1997. Skok Deposition at 34:4-15, 39:20-40:8.</p> <p>It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream Programmer’s Guide (Nov. 1997) is a guide that was distributed with SilverStream 1.0 software. Skok Deposition at 31:20-35:23. It describes SilverStream 1.0 as it existed in 1997. Skok Deposition</p>

Exhibit Number	Prior Art
	<p>at 34:4-15, 39:20-40:8.</p> <p>It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream Programmer's Guide (Sept. 1998) is a guide that was distributed with SilverStream software.</p> <p>It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream Administration Guide (Nov. 1997) is a guide that was distributed with SilverStream 1.0 software. Skok Deposition at 31:20-35:23. It describes SilverStream 1.0 as it existed in 1997. Skok Deposition at 34:4-15, 39:20-40:8.</p> <p>It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream Administration Guide (Sept. 1998) is a guide that was distributed with SilverStream software. It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>The SilverStream Guides all describe the prior art SilverStream system and are properly considered both as separate prior art references and together as a single prior art reference, or as any combination thereof.</p>
168-28	<p>SilverStream System SilverStream is a software platform that was on sale by SilverStream and in public use prior to the alleged invention. For example, SilverStream 1.0 was on sale by SilverStream and in public use no later than November 1997. Skok Deposition at 31:10-40:14; SilverStream Authorized Guide at v. SilverStream 1.5 is an incremental upgrade to SilverStream 1.0 that was on sale by SilverStream and in public use no later than September 1998. Skok Deposition at 40:9-23. SilverStream 1.5 was described in the SilverStream Authorized Guide book, which</p>

Exhibit Number	Prior Art
	<p>included a SilverStream 1.5 CD. Skok Deposition at 14:41-29:10. A further version, SilverStream 2.0, was on sale by SilverStream and in public use no later than 1998. SilverStream (including each of versions 1.0, 1.5, and 2.0) thus qualifies as prior art to the '397 patent under 35 U.S.C. § 102(a) and/or (b).</p> <p>The aforementioned prior art systems are themselves prior art. References describing these systems constitute disclosure of the prior art systems as well as constituting prior art independently.</p> <p>The SilverStream system is described in various documents, referenced below ("the SilverStream Prior Art"). Aside from disclosing the functionality of the publicly available and on-sale SilverStream system, these documents are themselves prior art that anticipate and/or render obvious the asserted claims of the '397 patent. Documents describing SilverStream 1.5 are also evidence of the functionality provided by SilverStream 1.0 and SilverStream 2.0 (and any intervening incremental versions). More generally, functionality of SilverStream 1.5 is evidence of the functionality of SilverStream 1.0 and 2.0, and vice versa. Skok Deposition at 40:9-23.</p> <p>SilverStream 2.0 is an article disclosing the use of JAR files in the SilverStream application by Chris Minnick, published at least as early as July 1, 1999 on www.drdobbs.com, and on information and belief is therefore prior art to the '397 patent at least under 35 U.S.C. § 102(a) and/or (b).</p> <p>SilverStream Product Demonstration is a collection of webpages made available online by SilverStream. The documents were publicly available on SilverStream's website no later than February 14, 1998 as reflected in the archive.org URL, and further reflect SilverStream software functionality that existed in 1998. Skok Deposition at 9:12-12:14, 31:4-11.</p> <p>The SilverStream Product Demonstration is thus prior art under 35 U.S.C. § 102(a)/(b) and evidence of the functionality of SilverStream 1.0, 1.5, and 2.0.</p>

Exhibit Number	Prior Art
	<p>SilverStream Authorized Guide is a book by Howard M. Block and Albert J. Dunn that was published in 1998. It describes SilverStream 1.5, including as it existed in September 1998 and December 1998. In addition to describing SilverStream 1.5 (and, by extension, SilverStream 1.0/2.0), SilverStream Authorized Guide is itself a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream Application Server Sampler Version 1.5 (“SilverStream 1.5 CD”) is a CD enclosed with the SilverStream Authorized Guide, and was thus on-sale and published in 1998. <i>See</i> XMO_MAG006740 at 7305 (picture of SilverStream 1.5 CD enclosed with SilverStream Authorized Guide).</p> <p>SilverStream 1.5 CD contains a demo version of SilverStream 1.5 as it existed no later than September 1998. Skok Deposition at 26:12-29:17. It also contains product documentation for SilverStream 1.5. Skok Deposition at 26:12-29:17.</p> <p>SilverStream 1.5 CD is thus an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b). The documentation on the CD is also prior art and a printed publication under 35 U.S.C. § 102(a)/(b). The description of SilverStream Authorized Guide is evidence of the functionality provided by the SilverStream 1.5 CD.</p> <p>U.S. Patent Pub. No. 2002/0091725 (“Skok”) was filed on May 12, 1998 and is therefore prior art to the ’397 patent under at least 35 U.S.C. §102(e). Skok is a patent directed to, and describes functionality of, SilverStream software as it existed in May 1998 and December 1998. Skok Deposition at 12:16-13:22, 31:4-11. Skok is also evidence of the functionality of SilverStream 1.0, 1.5, and 2.0.</p> <p>U.S. No. 6,209,029 (“Epstein”) was filed on May 12, 1998 and issued as a patent on March 27, 2001. Epstein is therefore prior art under at least 35 U.S.C. § 102(e). Epstein is directed to, and describes functionality of, SilverStream in or around May 1998 and December 1998. Skok Deposition at 29:21-31:11. Epstein is also</p>

Exhibit Number	Prior Art
	<p>evidence of the functionality of SilverStream 1.0, 1.5, and 2.0.</p> <p>U.S. Patent No. 6,880,129 (“Lee”) was filed on April 20, 2000 and issued as a patent on April 12, 2005. Lee claims priority to U.S. Provisional Patent Application No. 60/131,823, which was filed on April 29, 1999. Lee describes a subset of SilverStream functionality that existed in or around April 1999. Skok Deposition at 48:19-49:17.</p> <p>Lee is therefore prior art under at least 35 U.S.C. § 102(e). Lee is also evidence of the functionality of SilverStream 1.0, 1.5, and 2.0.</p> <p>The SilverStream Web Application Platform (“SilverStream White Paper”) is a white paper describing SilverStream version 1.0 as it was distributed in 1997. Skok Deposition at 36:1-39:19. It is prior art under 35 U.S.C. § 102(a)/(b) and is evidence of the functionality of SilverStream 1.0, 1.5, and 2.0.</p> <p>SilverStream 1.0 Starter Pack is a starter package for SilverStream 1.0 as it was sold in the third to fourth quarter of 1997. Skok Deposition at 31:20-35:23, 39:20-40:8.</p> <p>SilverStream 1.0 Starter Pack includes a CD containing the SilverStream 1.0 CD (XMO_MAG006739), the SilverStream Tutorial (Nov. 1997) (XMO_MAG007307), the SilverStream Administration Guide (Nov. 1997) (XMO_MAG008280), the SilverStream Programmer’s Guide (Nov. 1997) (XMO_MAG008405), and the SilverStream Installation Guide (Nov. 1997).</p> <p>SilverStream 1.0 Starter Pack is thus both an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b). Documentation on the CD and the paper documentation is also a printed publication and prior art under 35 U.S.C. § 102(a)/(b), alone and in combination.</p> <p>SilverStream 1.0 CD is a CD included with the SilverStream Starter Pack product packaging</p>

Exhibit Number	Prior Art
	<p>containing version 1.0 of SilverStream as it was sold in the third to fourth quarter of 1997. Skok Deposition at 31:20-35:25, 39:20-40:8.</p> <p>SilverStream 1.0 CD is thus evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b). Documentation on the CD is also prior art and a printed publication under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream 1.0a Sampler CD is a sample copy of SilverStream 1.0 software distributed in 1997.</p> <p>It is thus evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b). Documentation on the CD is also prior art and a printed publication under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream 1.0b Sampler CD is a sample copy of SilverStream 1.0 software distributed in 1997.</p> <p>It is thus evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b). Documentation on the CD is also prior art and a printed publication under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream Tutorial (Nov. 1997) is a guide that was distributed with SilverStream 1.0 software. Skok Deposition at 31:20-35:23. It describes SilverStream 1.0 as it existed in 1997. Skok Deposition at 34:4-15, 39:20-40:8.</p> <p>It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p>SilverStream Programmer's Guide (Nov. 1997) is a guide that was distributed with SilverStream 1.0 software. Skok Deposition at 31:20-35:23. It describes SilverStream 1.0 as it existed in 1997. Skok Deposition at 34:4-15, 39:20-40:8.</p> <p>It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p>

Exhibit Number	Prior Art
	<p data-bbox="602 331 1344 401">SilverStream Programmer's Guide (Sept. 1998) is a guide that was distributed with SilverStream software.</p> <p data-bbox="602 457 1360 562">It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p data-bbox="602 619 1365 800">SilverStream Administration Guide (Nov. 1997) is a guide that was distributed with SilverStream 1.0 software. Skok Deposition at 31:20-35:23. It describes SilverStream 1.0 as it existed in 1997. Skok Deposition at 34:4-15, 39:20-40:8.</p> <p data-bbox="602 810 1360 915">It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p data-bbox="602 972 1365 1152">SilverStream Administration Guide (Sept. 1998) is a guide that was distributed with SilverStream software. It is thus both evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, and a printed publication and prior art under 35 U.S.C. § 102(a)/(b).</p> <p data-bbox="602 1209 1317 1314">SilverStream INSIDE LOOK Beta 2 Version CD is a CD containing a 45-day evaluation beta version of SilverStream 2.0 in 1999. Skok Deposition 52:2-55:25.</p> <p data-bbox="602 1335 1360 1516">It is thus evidence of the functionality of SilverStream 1.0, 1.5, and 2.0, an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b). Documentation on the CD is also prior art and a printed publication under 35 U.S.C. § 102(a)/(b).</p> <p data-bbox="602 1572 1292 1677">SilverStream 2.0 Application Server is a packaged version of SilverStream 2.0 on sale in 1998. Skok Deposition at 49:22-51:2.</p> <p data-bbox="602 1688 1360 1835">On information and belief, SilverStream 2.0 Application Sever includes the SilverStream Administration Guide (Sept. 1998) and the SilverStream Programmer's Guide (Sept. 1998).</p> <p data-bbox="602 1845 1360 1950">SilverStream 2.0 Application Server is thus both an on-sale product and a printed publication, and prior art, under 35 U.S.C. § 102(a)/(b).</p>

1 Table 2 identifies the prior art references pursuant to Patent L.R. 3-3(a). These
2 disclosures are made based on information currently known and appreciated by Magento, and
3 are subject to further supplementation or amendment as discovery continues.

4 In accordance with Patent L.R. 3-3(b), the Exhibits hereto include invalidating prior
5 art references that render obvious one or more of the asserted claims of the '168 Patent.
6 Appendix A list prior art references that anticipate, and combinations of prior art reference(s)
7 that render obvious, and thus invalidate, various claims of the '168 Patent. These specific
8 combinations are exemplary of other combinations of prior art that would also render the
9 asserted claims obvious. In addition to the specific combinations of prior art and the specific
10 combinations of groups of prior art disclosed herein, Magento reserves the right to rely on
11 any combination of any prior art references disclosed herein.

12 Magento asserts that the references discussed in the '168 Exhibits anticipate various
13 asserted claims of the '168 Patent, and in particular, any claim for which a reference is
14 asserted to disclose all elements of the claim. If it is determined that some element of a given
15 claim is not disclosed in an anticipation reference, however, then Magento contends in the
16 alternative that the anticipation reference in combination with one or more references
17 identified in Appendix A, or with the knowledge and skill of a person of ordinary skill in the
18 art at the time of the invention, would have rendered that claim obvious.

19 As noted above and below, and as will be further discussed during the expert report
20 and discovery phase of the litigation, the motivation to combine the teachings of the patents
21 and other prior art referenced above is found in the art as specified in the '168 Exhibits and
22 in, for example: (1) the nature of the problem being solved, (2) the express, implied and
23 inherent teachings of the prior art, (3) the knowledge of persons of ordinary skill in the art;
24 (4) the fact that the prior art is generally directed towards website creation, often in the more
25 specific field of WYSIWYG editors, and often in the even more specific context of browser-
26 based WYSIWYG editors; and (5) the predictable results obtained in combining the different
27 elements of the prior art. The Supreme Court has held that a showing of a motivation to
28

combine within the references themselves is not required to prove obviousness. *KSR v. Teleflex*, 127 S. Ct. 1727, 1724 (2007) (“Any need or problem known in the field of endeavor at the time of invention may provide the motivation to combine.”).

C. Prior Art Admissions Made in the Patents-in-Suit and By the Patentee During Prosecution

In further detail below, by way of example only, each of the following Patents-in-Suit and/or the applicant in the prosecution history make general admissions concerning the state of the respective art. Examples include, among other things, suggesting problems and needs in the prior art and describing prior art techniques and elements. *See KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 417-422 (2007).

As the ’397 and ’168 patents share substantively identical disclosures, the exemplary admissions below are provided in connection with the ’397 patent. Parallel admissions are found in the ’168 patent. Magento’s identification of these statements should not be construed as agreement or acquiescence in the teachings of the patents.

- The prior art, such as Faustini, disclosed a “run time engine which is an interpreted or executable file, such as virtual machine commands, and which contains within the Faustini run time code all of the information necessary to generate a display (the display data is embedded within the Faustini run time code).” XMO0000001 at 300 (’397 Prosecution History, 2002-01-17 Office Action Response, Remarks at 5).
- “Conventional web site construction tools operate on traditional operating system platforms and generate as output HTML . . . and Script Code (e.g., JavaScript). A browser draws a web page associated with the web site by interpreting the HTML and JavaScript Code.” ’397 Patent at 1:11-15.
- HTML and JavaScript were known. ’397 Patent at 1:11-15.
- Java, the Java Virtual Machine, C++ and Visual Basic were known. ’397 Patent at 1:23-25, 54; 35:34-37.
- Dynamic HTML and Cascading Style Sheets were known. ’397 patent at 1:59.

1 **IV. DISCLOSURES PURSUANT TO PATENT LOCAL RULE 3-3(d)**

2 Pursuant to Patent L.R. 3-3(d), Magento lists below the grounds upon which Magento
 3 presently contends the Asserted Claims of the '397 Patent are invalid for failure to meet the
 4 requirements of 35 U.S.C. §§ 101, 112(1) and/or 112(2). Magento further reserves the right
 5 to rely upon the facts, evidence, and arguments advanced in the Expert Report of Chris
 6 Schmandt Regarding Invalidity of Asserted Claims, *Express Mobile LLC v. Svanaco, Inc.*,
 7 No. 2:17-cv-130-JRG (E.D. Tex.) and exhibits thereto in support of invalidity of the '397 and
 8 '168 patent claims.

9 **A. U.S. Patent No. 6,546,397**

10 **1. Invalidity under 35 U.S.C. § 101 – Lack of Patent Eligible Subject**
 11 **Matter**

12 35 U.S.C. § 101 provides as follows: “Whoever invents or discovers any new and
 13 useful process, machine, manufacture, or composition of matter, or any new and useful
 14 improvement thereof, may obtain a patent therefor, subject to the conditions and
 15 requirements of this title.” The Supreme Court has “interpreted § 101 and its predecessors . .
 16 . for more than 150 years” to “contain[] an important implicit exception: Laws of nature,
 17 natural phenome, and abstract ideas are not patentable.” *Alice Corp. Pty. Ltd. v. CLS Bank*
 18 *Int’l*, 134 S. Ct. 2347, 2354 (2014) (quoting *Ass’n for Molecular Pathology v. Myriad*
 19 *Genetics, Inc.*, 133 S. Ct. 2107, 2116 (2013)).

20 The *Alice* framework applies a two-step analysis for determining patent eligibility:
 21 “First, we determine whether the claims at issue are directed to one of those patent ineligible
 22 concepts. If so, we then ask, ‘[w]hat else is there in the claims before us?’ To answer that
 23 question, we consider the elements of each claim both individually and ‘as an ordered
 24 combination’ to determine whether the additional elements ‘transform the nature of the
 25 claim’ into a patent-eligible application. We have described step two of this analysis as a
 26 search for an ‘inventive concept’—*i.e.*, an element or combination of elements that is
 27 sufficient to ensure that the patent in practice amounts to significantly more than a patent
 28 upon the [ineligible concept] itself.” *Alice* at 2355.

1 “[R]elying on a computer to perform routine tasks more quickly or more accurately is
2 insufficient to render a claim patent eligible.” *OIP Techs., Inc. v. Amazon.com, Inc.*, 788
3 F.3d 1359, 1363 (Fed. Cir. 2015). “And after *Alice*, there can remain no doubt: recitation of
4 generic computer limitations does not make an otherwise ineligible claim patent-eligible.
5 The bare fact that a computer exists in the physical rather than purely conceptual realm is
6 beside the point.” *DDR Holdings, LLC v. Hotels.com, LP*, 773 F.3d 1245, 1256 (Fed. Cir.
7 2014) (citation and quotation marks omitted). “Adding routine additional steps such as
8 updating an activity log, requiring a request from the consumer to view the ad, restrictions on
9 public access, and use of the internet does not transform an otherwise abstract idea into
10 patent-eligible subject matter.” *Ultramercial, Inc. v. HULU, LLC*, 772 F.3d 709, 716 (Fed.
11 Cir. 2014).

12 For example, independent claims 1, 2, and 37 of the ’397 patent are directed to the
13 abstract idea of generating and displaying elements that appear in the manner and format
14 selected by a user. This type of what-you-see-is-what-you-get functionality is something that
15 humans have been performing by hand for decades—for example, newspaper or magazine
16 layouts. Moving it to a computer-based or Internet setting utilizes only conventional
17 computer technologies and lacks any inventive concept. For example, humans could readily
18 prepare code for the display of websites using general purpose computer hardware and
19 software.

20 The ’397 patent admits that it was well known that users could prepare code for
21 generating web pages accessible by browsers, either by coding the pages manually, or by
22 operating a prior art product that could generate such code. ’397 patent at 5:40-47; Fig. 1.
23 The code could be generated according to known programming languages and protocols that
24 the ’397 patent assumes the existence of, such as “full featured programming language[s]”
25 like Java, or by, for example, HTML and HTML extensions (such as Dynamic HTML,
26 JavaScript and Cascading Style Sheets). ’397 patent at 1:52-67. Parallel admissions are
27 found in the ’168 patent.

28 The asserted dependent claims simply add routine and conventional steps, and none

1 of the limitations of each claim considered together provide an inventive concept that
 2 transforms any claim into patent eligible subject matter. As reflected in the Exhibits hereto,
 3 the claims are directed to known functionality. Thus, the asserted claims of the '397 patent
 4 are directed to patent ineligible subject matter and are invalid under § 101.

5 **2. Invalidity under 35 U.S.C. § 112(1) – Lack of Enablement**

6 The first paragraph of 35 U.S.C. § 112 requires a patent to describe “the manner and
 7 process of making and using [the claimed invention], in such full, clear, concise, and exact
 8 terms as to enable any person skilled in the art to which it pertains, or with which it is most
 9 nearly connected, to make and use the same.” A patent must disclose enough to permit a
 10 person of skill in the art, after reading the specification, to practice the claimed invention
 11 without undue experimentation. *Sitrick v. Dreamworks, LLC*, 516 F.3d 993, 999 (Fed. Cir.
 12 2008). Moreover, “[t]he full scope of the claimed invention must be enabled.” *Id.*; *see also*
 13 *id.* at 1000 (“Because the asserted claims are broad enough to cover both movies and video
 14 games, the patents must enable both embodiments.”).

15 Claim 1 is invalid for lack of enablement with regard to the term “generating a
 16 display in accordance with one or more user selected settings substantially
 17 contemporaneously with the selection thereof.” The specification does not enable one of
 18 ordinary skill in the art at the time of the alleged invention to make or use the alleged
 19 invention. For example, the specification does not teach what constitutes “substantially
 20 contemporaneously.”

21 Claim 2 is invalid for lack of enablement with regard to the term “substantially
 22 contemporaneously.” The specification does not enable one of ordinary skill in the art at the
 23 time of the alleged invention to make or use the alleged invention. For example, the
 24 specification does not teach what constitutes “substantially contemporaneously.”

25 Claim 6 is invalid for lack of enablement with regard to the term “a vector object.”
 26 The specification does not enable one of ordinary skill in the art at the time of the alleged
 27 invention to make or use the alleged invention. For example, the specification does not teach
 28 how to generate, or even explain what constitutes, a vector object.

1 Claim 9 is invalid for lack of enablement with regard to the term “means for storing
2 information representative of selected style in said database.” The specification fails to
3 adequately disclose an associated structure and/or algorithm for performing the function, and
4 accordingly, the specification does not enable one of ordinary skill in the art at the time of the
5 alleged invention to make or use the alleged invention.

6 Claim 14 is invalid for lack of enablement with regard to the term “means for storing
7 information representative of said selected description of elements in said database.” The
8 specification fails to adequately disclose an associated structure and/or algorithm for
9 performing the function, and accordingly, the specification does not enable one of ordinary
10 skill in the art at the time of the alleged invention to make or use the alleged invention.

11 Claim 17 is invalid for lack of enablement with regard to the term “means to
12 synchronize said description of said one or more elements.” The specification fails to
13 adequately disclose an associated structure and/or algorithm for performing the function, and
14 accordingly, the specification does not enable one of ordinary skill in the art at the time of the
15 alleged invention to make or use the alleged invention.

16 Claim 20 is invalid for lack of enablement with regard to the term “means for
17 defining said description of said element.” The specification fails to adequately disclose an
18 associated structure and/or algorithm for performing the function, and accordingly, the
19 specification does not enable one of ordinary skill in the art at the time of the alleged
20 invention to make or use the alleged invention.

21 Claim 23 is invalid for lack of enablement with regard to the term “means for storing
22 information representative of said selected description in said database.” The specification
23 fails to adequately disclose an associated structure and/or algorithm for performing the
24 function, and accordingly, the specification does not enable one of ordinary skill in the art at
25 the time of the alleged invention to make or use the alleged invention.

26 Claim 25 is invalid for lack of enablement with regard to the term “dynamic web
27 page scaling mechanism.” The specification fails to adequately disclose how to scale one or
28 more generated web pages for viewing on a display, much less how to dynamically scale web

1 pages, and accordingly, the specification does not enable one of ordinary skill in the art at the
2 time of the alleged invention to make or use the alleged invention.

3 Claim 29 is invalid for lack of enablement with respect to the term “file size reduction
4 means for reducing the total size of said run time files to less than approximately 50K and for
5 reducing the total size of said run time file of the first web page of said website to less than
6 25K.” The specification fails to adequately disclose an associated structure and/or algorithm
7 for performing the function, nor does the specification explain how to achieve the function
8 for all run time files. Accordingly, the specification does not enable one of ordinary skill in
9 the art at the time of the alleged invention to make or use the alleged invention.

10 Claim 30 is invalid for lack of enablement with respect to the term “said total size of
11 said run time files is from approximately 12K to approximately 50K.” The specification fails
12 to adequately disclose an associated structure and/or algorithm for performing the function,
13 nor does the specification explain how to achieve the result for all run time files.
14 Accordingly, the specification does not enable one of ordinary skill in the art at the time of
15 the alleged invention to make or use the alleged invention.

16 Claim 35 is invalid for lack of enablement with regard to the term “dynamic resizing
17 means operable to redefine a size of a web page upon being display.” The specification fails
18 to adequately disclose an associated structure and/or algorithm for performing the function,
19 and accordingly, the specification does not enable one of ordinary skill in the art at the time
20 of the alleged invention to make or use the alleged invention.

21 Claim 37 is invalid for lack of enablement with regard to the term
22 “contemporaneously.” The specification does not enable one of ordinary skill in the art at the
23 time of the alleged invention to make or use the alleged invention. For example, the
24 specification does not explain how to generate the display in accordance with said assembly
25 of settings contemporaneously with the acceptance thereof.

26 The aforementioned claims are invalid for failure to satisfy the enablement
27 requirement. In addition, any claim that recites a term identified as lacking enablement, or
28 that incorporates such terms by dependency, or that uses a substantially similar term, is also

invalid for failure to comply with the enablement requirement.

3. Invalidity under 35 U.S.C. § 112(1) – Lack of Written Description

The first paragraph of 35 U.S.C. § 112 requires a patent specification to contain “a written description of the invention.” The written description “must do more than merely disclose that which would render the claimed invention obvious.” *ICU Med., Inc. v. Alaris Med. Sys., Inc.*, 558 F.3d 1368, 1377 (Fed. Cir. 2009). The written description must “clearly allow persons of ordinary skill in the art to recognize that the inventor invented what is claimed” by the time of the application filing date. *Ariad Pharm., Inc. v. Eli Lilly & Co.*, 598 F.3d 1336, 1351 (Fed. Cir. 2010) (en banc). Thus, a written description is inadequate where the claim in question exceeds the scope of what the patent discloses by, for example, omitting an attribute of the described invention from the limitations, thereby over-extending the reach of the claim. *ICU*, 558 F.3d at 1377-78.

At least in view of Express Mobile’s apparent construction of the claims in its Infringement Contentions, at least some claims of the ’397 are invalid because the specification as filed does not contain a written description of the claimed inventions. In particular, the patent disclosure would not lead a person of ordinary skill in the art to understand that the named inventor had possession of the purported inventions as claimed, either as a whole or in view of specific elements (examples of which are given below).

Claim 1 is invalid for lack of written description with regard to the term “substantially contemporaneously.” The specification does not teach what constitutes “substantially contemporaneously,” and accordingly, the description in the specification does not allow a person of ordinary skill in the art to recognize that the applicant invented what is claimed.

Claim 2 is invalid for lack of written description with regard to the term “substantially contemporaneously.” The specification does not teach what constitutes “substantially contemporaneously,” and accordingly, the description in the specification does not allow a person of ordinary skill in the art to recognize that the applicant invented what is claimed.

Claim 6 is invalid for lack of written description with regard to the term “a vector object.” The specification does not teach what constitutes “a vector object,” and accordingly,

1 the description in the specification does not allow a person of ordinary skill in the art to
2 recognize that the applicant invented what is claimed.

3 Claim 9 is invalid for lack of written description with regard to the term “means for
4 storing information representative of selected style in said database.” The specification fails
5 to adequately disclose an associated structure and/or algorithm for performing the function,
6 and accordingly, the description in the specification does not allow a person of ordinary skill
7 in the art to recognize that the applicant invented what is claimed.

8 Claim 14 is invalid for lack of written description with regard to the term “means for
9 storing information representative of said selected description of elements in said database.”
10 The specification fails to adequately disclose an associated structure and/or algorithm for
11 performing the function, and accordingly, the description in the specification does not allow
12 a person of ordinary skill in the art to recognize that the applicant invented what is claimed.

13 Claim 17 is invalid for lack of written description with regard to the term “means to
14 synchronize said description of said one or more elements.” The specification fails to
15 adequately disclose an associated structure and/or algorithm for performing the function, and
16 accordingly, the description in the specification does not allow a person of ordinary skill in
17 the art to recognize that the applicant invented what is claimed.

18 Claim 20 is invalid for lack of written description with regard to the term “means for
19 defining said description of said element.” The specification fails to adequately disclose an
20 associated structure and/or algorithm for performing the function, and accordingly, the
21 description in the specification does not allow a person of ordinary skill in the art to
22 recognize that the applicant invented what is claimed.

23 Claim 23 is invalid for lack of written description with regard to the term “means for
24 storing information representative of said selected description in said database.” The
25 specification fails to adequately disclose an associated structure and/or algorithm for
26 performing the function, and accordingly, the description in the specification does not allow
27 a person of ordinary skill in the art to recognize that the applicant invented what is claimed.

28 Claim 25 is invalid for lack of written description with regard to the term “dynamic

1 web page scaling mechanism.” The specification fails to adequately disclose how to scale
2 one or more generated web pages for viewing on a display, much less how to dynamically
3 scale web pages, and accordingly, the description in the specification does not allow a person
4 of ordinary skill in the art to recognize that the applicant invented what is claimed.

5 Claim 29 is invalid for lack of written description with respect to the term “file size
6 reduction means for reducing the total size of said run time files to less than approximately
7 50K and for reducing the total size of said run time file of the first web page of said website
8 to less than 25K.” The specification fails to adequately disclose an associated structure
9 and/or algorithm for performing the function, nor does the specification explain how to
10 achieve the function for all run time files. Accordingly, the description in the specification
11 does not allow a person of ordinary skill in the art to recognize that the applicant invented
12 what is claimed.

13 Claim 30 is invalid for lack of written description with respect to the term “said total
14 size of said run time files is from approximately 12K to approximately 50K.” The
15 specification fails to adequately disclose an associated structure and/or algorithm for
16 performing the function, nor does the specification explain how to achieve the result for all
17 run time files. Accordingly, the description in the specification does not allow a person of
18 ordinary skill in the art to recognize that the applicant invented what is claimed.

19 Claim 35 is invalid for lack of written description with regard to the term “dynamic
20 resizing means operable to redefine a size of a web page upon being display.” The
21 specification fails to adequately disclose an associated structure and/or algorithm for
22 performing the function, and accordingly, the description in the specification does not allow
23 a person of ordinary skill in the art to recognize that the applicant invented what is claimed.

24 Claim 37 is invalid for lack of written description with regard to the term
25 “contemporaneously.” The specification does not allow a person of ordinary skill in the art
26 to recognize that the applicant invented what is claimed.

27 The aforementioned claims are invalid for failure to satisfy the written description
28 requirement. In addition, any claim that recites a term identified as lacking written

description support, or that incorporates such terms by dependency, or that uses a substantially similar term, is also invalid for failure to comply with the written description requirement.

4. Invalidity under 35 U.S.C. § 112(2) – Indefiniteness

The second paragraph of 35 U.S.C. § 112 requires that a patent claim “particularly point out and distinctly claim [] the subject matter which the applicant regards as his invention.” Claim terms that fail to inform those of ordinary skill in the art as to their scope with reasonable certainty fail to satisfy the definiteness requirement. *See Nautilus, Inc. v. Biosig Instruments, Inc.*, 134 S. Ct. 2120 (2014).

The sixth paragraph of 35 U.S.C. § 112 provides that “[a]n element in a claim for a combination may be expressed as a means or step for performing a specified function without the recital of structure, material, or acts in support thereof, and such claim shall be construed to cover the corresponding structure, material, or acts described in the specification and equivalents thereof.” For such means-plus-function claim elements, “[i]f the specification does not contain an adequate disclosure of the structure that corresponds to the claimed function, the patentee will have failed to particularly point out and distinctly claim the invention [under § 112, ¶ 2], which renders the claim invalid for indefiniteness.” *Advanced Ground Info. Sys. v. Life360*, 830 F.3d 1341, 1349 (Fed. Cir. 2016) (internal citation omitted).

In cases of means-plus-function claiming for a computer or processor-based function, the corresponding structure is the algorithm disclosed in the specification for performing the claimed function. *See Aristocrat Techs. Austl. Pty Ltd. v. Int’l Game Tech.*, 521 F.3d 1328, 1333 (Fed. Cir. 2008); *Harris Corp. v. Ericsson Inc.*, 417 F.3d 1241, 1249 (Fed. Cir. 2005). In *Aristocrat*, the Federal Circuit explained the “point of the requirement that the patentee disclose particular structure in the specification and that the scope of the patent claims be limited to that structure and its equivalents is to avoid pure functional claiming.” 521 F.3d at 1333.

Claim 1 is invalid as indefinite with regard to the term “substantially

1 contemporaneously.” The meaning of the term is not reasonably certain when read in view
2 of the intrinsic evidence, as a person of ordinary skill in the art would not know what amount
3 of time constitutes “substantially contemporaneously.”

4 Claim 2 is invalid as indefinite with regard to the term “substantially
5 contemporaneously.” The meaning of the term is not reasonably certain when read in view
6 of the intrinsic evidence, as a person of ordinary skill in the art would not know what amount
7 of time constitutes “substantially contemporaneously.”

8 Claim 4 is invalid as indefinite with regard to the term “multi-dimensional arrays of
9 various multimedia objects.” The meaning of the term is not reasonably certain when read in
10 view of the intrinsic evidence, as a person of ordinary skill would not know what a “multi-
11 dimensional array of various multimedia objects” refers to.

12 Claim 4 is also invalid as indefinite with regard to the term “multimedia objects.”
13 The meaning of the term is not reasonably certain when read in view of the intrinsic
14 evidence. For example, Claim 5 suggests that multimedia objects can include a color, a font,
15 and a URL, which runs contrary to the ordinary meaning of multimedia objects and renders
16 the meaning of the term not reasonably certain to a person of ordinary skill.

17 Claim 6 is invalid as indefinite with regard to the term “a vector object.” The
18 meaning of the term is not reasonably certain when read in view of the intrinsic evidence, as
19 a person of ordinary skill would not know what a “vector object” refers to.

20 Claim 9 is invalid as indefinite with regard to the term “an element style.” The
21 meaning of the term is not reasonably certain when read in view of the intrinsic evidence, as
22 a person of ordinary skill would not know what an “element style” refers to.

23 Claim 9 is invalid as indefinite with regard to the term “said build engine.” The
24 meaning of the term is not reasonably certain when read in view of the intrinsic evidence, as
25 the term lacks any antecedent basis. This is true of all claims that improperly refer to “said
26 build engine” without antecedent basis.

27 Claim 9 is invalid as indefinite with regard to the term “means for storing information
28 representative of selected style in said database.” The specification fails to adequately

1 disclose an associated structure and/or algorithm for performing the function, and thus the
2 meaning of the term is not reasonably certain to a person of ordinary skill.

3 Claim 11 is invalid as indefinite with regard to the term “styles.” The meaning of the
4 term is not reasonably certain when read in view of the intrinsic evidence, as a person of
5 ordinary skill would not know what “styles” refers to.

6 Claim 14 is invalid as indefinite with regard to the term “wherein said description of
7 elements is a transition or a timeline which is selected according to input from a mouse.”
8 The meaning of the term is not reasonably certain when read in view of the intrinsic
9 evidence, as a person of ordinary skill would not know whether the transition or timeline is
10 selected during webpage design, or whether the transition or timeline is shown on a displayed
11 website to an end user utilizing a mouse.

12 Claim 14 is invalid as indefinite with regard to the term “means for storing
13 information representative of said selected description of elements in said database.” The
14 specification fails to adequately disclose an associated structure and/or algorithm for
15 performing the function, and thus the meaning of the term is not reasonably certain to a
16 person of ordinary skill.

17 Claim 14 is invalid as indefinite with regard to the term “said build engine.” The meaning
18 of the term is not reasonably certain when read in view of the intrinsic evidence, as the term lacks
19 any antecedent basis.

20 Claim 17 is invalid as indefinite with regard to the term “said build engine.” The
21 meaning of the term is not reasonably certain when read in view of the intrinsic evidence, as
22 the term lacks any antecedent basis.

23 Claim 17 is invalid as indefinite with regard to the term “means to synchronize said
24 description of said one or more elements.” The specification fails to adequately disclose an
25 associated structure and/or algorithm for performing the function. Further, the meaning of
26 the recited function is not reasonably certain, as there is no indication what “said one or more
27 elements” are being synchronized with. Thus, the meaning of the term is not reasonably
28 certain to a person of ordinary skill.

1 Claim 19 is invalid as indefinite with regard to the term “child object.” The meaning
2 of the term is not reasonably certain when read in view of the intrinsic evidence, as a person
3 of ordinary skill would not know what “child object” refers to. For example, the claim does
4 not specify what a “child object” is a child of.

5 Claim 19 is invalid as indefinite with regard to the term “said build engine.” The
6 meaning of the term is not reasonably certain when read in view of the intrinsic evidence, as
7 the term lacks any antecedent basis.

8 Claim 20 is invalid as indefinite with regard to the term “said build engine.” The
9 meaning of the term is not reasonably certain when read in view of the intrinsic evidence, as
10 the term lacks any antecedent basis.

11 Claim 20 is invalid as indefinite with regard to the term “child object.” The meaning
12 of the term is not reasonably certain when read in view of the intrinsic evidence, as a person
13 of ordinary skill would not know what “child object” refers to. For example, the claim does
14 not specify what a “child object” is a child of.

15 Claim 20 is invalid as indefinite with regard to the term “child button.” The meaning
16 of the term is not reasonably certain when read in view of the intrinsic evidence, as a person
17 of ordinary skill would not know what “child button” refers to. For example, the claim does
18 not specify what a “child button” is a child of.

19 Claim 20 is invalid as indefinite with regard to the term “means for defining said
20 description of said element.” The specification fails to adequately disclose an associated
21 structure and/or algorithm for performing the function, and thus the meaning of the term is
22 not reasonably certain to a person of ordinary skill.

23 Claim 23 is invalid as indefinite with regard to the term “said description of elements
24 is a transition or a timeline which is selected according to input from a mouse.” The meaning
25 of the term is not reasonably certain when read in view of the intrinsic evidence, as a person
26 of ordinary skill would not know whether the transition or timeline is selected during
27 webpage design, or whether the transition or timeline is shown on a displayed website to an
28 end user utilizing a mouse.

1 Claim 23 is invalid as indefinite with regard to the term “means for storing
2 information representative of said selected description in said database.” The specification
3 fails to adequately disclose an associated structure and/or algorithm for performing the
4 function, and thus the meaning of the term is not reasonably certain to a person of ordinary
5 skill.

6 Claim 23 is invalid as indefinite with regard to the term “said build engine.” The
7 meaning of the term is not reasonably certain when read in view of the intrinsic evidence, as
8 the term lacks any antecedent basis.

9 Claim 29 is invalid as indefinite with respect to the term “file size reduction means
10 for reducing the total size of said run time files to less than approximately 50K and for
11 reducing the total size of said run time file of the first web page of said website to less than
12 25K.” The specification fails to adequately disclose an associated structure and/or algorithm
13 for performing the function, and thus the meaning of the term is not reasonably certain to a
14 person of ordinary skill.

15 Claim 35 is invalid as indefinite with regard to the term “the build engine.” The
16 meaning of the term is not reasonably certain when read in view of the intrinsic evidence, as
17 the term lacks any antecedent basis.

18 Claim 35 is invalid as indefinite with regard to the term “dynamic resizing means
19 operable to redefine a size of a web page upon being display.” The specification fails to
20 adequately disclose an associated structure and/or algorithm for performing the function. In
21 addition, it is unclear from the intrinsic evidence when the size of the web page is redefined.
22 Thus the meaning of the term is not reasonably certain to a person of ordinary skill.

23 Claim 37 is invalid as indefinite with regard to the term “contemporaneously.” The
24 meaning of the term is not reasonably certain when read in view of the intrinsic evidence, as
25 a person of ordinary skill in the art would not know what constitutes “contemporaneously.”

26 The aforementioned claims are invalid as indefinite. In addition, any claim that
27 recites a term identified as indefinite, or that incorporates such terms by dependency, or that
28 uses a substantially similar term, is also invalid as indefinite.

B. U.S. Patent No. 7,594,168

1. Invalidity under 35 U.S.C. § 101 – Lack of Patent Eligible Subject Matter

Independent claim 1 of the '168 patent is directed to the abstract idea of generating and displaying elements that appear in the manner and format selected by a user, as discussed above with respect to the '397 patent. This type of WYSIWYG functionality has been performed by hand by humans for decades, for example in the context of newspaper or magazine layouts. Simply moving it to a computer-based or Internet setting utilizes only conventional computer technologies and lacks any inventive concept. For example, humans could prepare code for the display of websites using general purpose computer hardware and software. The '397 patent admits that it was well known that users could prepare code for generating web pages accessible by browsers, either by coding the pages manually, or by operating a prior art product that could generate such code. '397 patent at 5:40-47; Fig. 1. The code could be generated according to known programming languages and protocols that the '397 patent assumes the existence of, such as “full featured programming language[s]” like Java, or by, for example, HTML and HTML extensions (such as Dynamic HTML, JavaScript and Cascading Style Sheets). '397 patent at 1:52-67. Parallel admissions are found in the '168 patent.

The asserted dependent claims simply add more routine steps, and none of the limitations of each claim considered together provide an inventive concept that transforms any claim into patent eligible subject matter. As reflected in the Exhibits hereto, the claims are directed to known functionality. Thus, the asserted claims of the '168 patent are directed to patent ineligible subject matter and are invalid under § 101.

2. Invalidity under 35 U.S.C. § 112(1) – Lack of Enablement

Claim 1 is invalid for lack of enablement with respect to the term “wherein each web page is defined entirely by each of the plurality of objects comprising that web page and the style associated with the object.” A person of ordinary skill would understand that no web page is defined entirely by the “objects comprising the web page,” but depends upon, among

1 other things, code such as HTML code that does not define an object. The specification does
 2 not describe any new programming language or scheme that creates web pages defined
 3 entirely by web page objects and their associated styles. Accordingly, the description in the
 4 specification does not enable one of ordinary skill in the art at the time of the alleged
 5 invention to make or use the alleged invention.

6 Claim 5 is invalid for lack of enablement with respect to the term “file size reduction
 7 means for reducing the total size of files generated by said build engine to a size of between
 8 12K and 50K.” The specification fails to adequately disclose an associated structure and/or
 9 algorithm for performing the function, or for achieving the claimed result with all files
 10 potentially generated by a build engine. In addition, the claims do not specify what files are
 11 generated by the build engine. Accordingly, the description in the specification does not
 12 enable one of ordinary skill in the art at the time of the alleged invention to make or use the
 13 alleged invention.

14 The aforementioned claims are invalid for failure to satisfy the enablement. In
 15 addition, any claim that recites a term identified as lacking enablement, or that incorporates
 16 such terms by dependency, or that uses a substantially similar term, is also invalid for failure
 17 to comply with the enablement requirement.

18 3. Invalidity under 35 U.S.C. § 112(1) – Lack of Written Description

19 The first paragraph of 35 U.S.C. § 112 requires a patent specification to contain “a
 20 written description of the invention.” The written description “must do more than merely
 21 disclose that which would render the claimed invention obvious.” *ICU Med., Inc. v. Alaris*
 22 *Med. Sys., Inc.*, 558 F.3d 1368, 1377 (Fed. Cir. 2009). The written description must “clearly
 23 allow persons of ordinary skill in the art to recognize that the inventor invented what is
 24 claimed” by the time of the application filing date. *Ariad Pharm., Inc. v. Eli Lilly & Co.*, 598
 25 F.3d 1336, 1351 (Fed. Cir. 2010) (en banc). Thus, a written description is inadequate where
 26 the claim in question exceeds the scope of what the patent discloses by, for example,
 27 omitting an attribute of the described invention from the limitations, thereby over-extending
 28 the reach of the claim. *ICU*, 558 F.3d at 1377-78.

1 At least in view of Express Mobile’s apparent construction of the claims in its
2 Infringement Contentions, at least some claims of the ’168 are invalid because the
3 specification as filed does not contain a written description of the claimed inventions. In
4 particular, the patent disclosure would not lead a person of ordinary skill in the art to
5 understand that the named inventor had possession of the purported inventions as claimed,
6 either as a whole or in view of specific elements (examples of which are given below).

7 Claim 1 is invalid for lack of written description with respect to the term “wherein
8 each web page is defined entirely by each of the plurality of objects comprising that web
9 page and the style associated with the object.” A person of ordinary skill would understand
10 that no web page is defined entirely by the objects comprising the web page, but depends
11 upon, among other things, code such as HTML code that does not define an object. The
12 specification does not describe any new programming language or scheme that creates web
13 pages defined entirely by web page objects and their associated styles. Accordingly, the
14 description in the specification does not allow a person of ordinary skill in the art to
15 recognize that the applicant invented what is claimed.

16 Claim 5 is invalid for lack of written description with respect to the term “file size
17 reduction means for reducing the total size of files generated by said build engine to a size of
18 between 12K and 50K.” The specification fails to adequately disclose an associated structure
19 and/or algorithm for performing the function, or for achieving the claimed result with all files
20 potentially generated by a build engine. In addition, the claims do not specify what files are
21 generated by the build engine. Accordingly, the description in the specification does not
22 allow a person of ordinary skill in the art to recognize that the applicant invented what is
23 claimed.

24 The aforementioned claims are invalid for failure to satisfy the written description
25 requirement. In addition, any claim that recites a term identified as lacking written
26 description support, or that incorporates such terms by dependency, or that uses a
27 substantially similar term, is also invalid for failure to comply with the written description
28 requirement.

4. Invalidity under 35 U.S.C. § 112(2) – Indefiniteness

Claim 1 is invalid as indefinite with regard to the terms “style” and “style data.” The meaning of the term is not reasonably certain when read in view of the intrinsic evidence, as a person of ordinary skill would not know what “style” or “style data” refers to.

Claim 2 is invalid as indefinite with regard to the term “child.” The meaning of the term is not reasonably certain when read in view of the intrinsic evidence, as a person of ordinary skill would not know what “child” refers to. For example, the claim does not specify what “a child” is a child of.

Claim 2 is invalid as indefinite with regard to the terms “child button” and “child image objects.” The meaning of the terms is not reasonably certain when read in view of the intrinsic evidence, as a person of ordinary skill would not know what “child button” or “child image object” refers to. For example, the claim does not specify what “child button and child image objects” are children of.

Claim 3 is invalid as indefinite with regard to the terms “child button” and “child image objects.” The meaning of the terms is not reasonably certain when read in view of the intrinsic evidence, as a person of ordinary skill would not know what “child button” or “child image object” refers to. For example, the claim does not specify what “child button and child image objects” are children of.

Claim 5 is invalid as indefinite with respect to the term “file size reduction means for reducing the total size of files generated by said build engine to a size of between 12K and 50K.” The specification fails to adequately disclose an associated structure and/or algorithm for performing the function, and thus the meaning of the term is not reasonably certain to a person of ordinary skill.

Claim 5 is invalid as indefinite with regard to the term “files generated by said build engine.” The meaning of the term is not reasonably certain when read in view of the intrinsic evidence, as a person of ordinary skill would not know what files are generated by the build engine. For example, there is no antecedent basis for the term “files.”

The aforementioned claims are invalid as indefinite. In addition, any claim that

recites a term identified as indefinite, or that incorporates such terms by dependency, or that uses a substantially similar term, is also invalid as indefinite.

V. DISCLOSURES PURSUANT TO PATENT LOCAL RULE 3-4

Magento is producing herewith documentation in accordance with the requirements of Patent Local Rule 3-4.

A. Patent L.R. 3-4(a)

Magento identifies the following as constituting “[s]ource code, specifications, schematics, flow charts, artwork, formulas, or other documentation sufficient to show the operation of any aspects or elements of an Accused Instrumentality identified by the patent claimant in its Patent L.R. 3-1(c) chart:”

MAG_SC000001

MAG000001 - MAG001819

MAG010184 – MAG046051

Source code for Magento Enterprise Edition is available for inspection at Sidley Austin’s San Francisco offices, subject to the terms of the Stipulated Protective Order entered July 13, 2018 at Dkt. 74..

Magento’s identification of the foregoing documents is not acquiescence in any allegations in Express Mobile’s Patent L.R. 3-1 Infringement Contentions, nor an admission that those contentions properly identify the accused instrumentalities or are otherwise sufficient.

Magento’s investigation is continuing, and Magento reserves the right to supplement or amend this disclosure as discovery continues.

B. Patent L.R. 3-4(b)

Magento identifies the following as constituting “[a] copy or sample of the prior art identified pursuant to Patent L.R. 3-3(a) which does not appear in the file history of the patent(s) at issue:”³

³ As all of the prior art asserted appears in English, Magento is not producing herewith any

1 MAG001820 - MAG007748

2 To the extent not included in such Bates range, the prior art is available for inspection
3 or copying upon request or has been produced by Express Mobile. Magento reserves the
4 right to supplement or amend this disclosure as discovery continues, including but not limited
5 to, in response to claim construction proceedings, new or additional arguments by Express
6 Mobile concerning infringement or invalidity, and orders of the Court.

7 **C. Patent L.R. 3-4(c)**

8 Magento identifies the following as constituting “agreements that the party opposing
9 infringement contends are comparable to a license that would result from a hypothetical
10 reasonable royalty negotiation:”

11 Magento is currently unaware of any agreements in its possession that “are
12 comparable to a license that would result from a hypothetical reasonable royalty negotiation”
13 between Magento and Express Mobile.

14 Magento reserves the right to supplement or amend this disclosure as discovery
15 continues. Further, Magento understands that there may be license agreements involving
16 Express Mobile that have not been produced in their entirety or that have yet to be produced.
17 Magento reserves the right to rely upon agreements produced by Express Mobile as
18 comparable licenses as appropriate, though this reservation should not be taken as an
19 assertion that any agreements involving, or produced by, Express Mobile constitute
20 comparable licenses that would result from a hypothetical reasonable royalty negotiation
21 between Magento and Express Mobile.

22 **D. Patent L.R. 3-4(d)**

23 Magento identifies the following as constituting “[d]ocuments sufficient to show the
24 sales, revenue, cost, and profits for accused instrumentalities identified pursuant to Patent
25 L.R. 3-1(b) for any period of alleged infringement:”
26

27
28 translations of prior art.

1 MAG007749

2 Magento's identification of the foregoing documents is not acquiescence in any
3 allegations in Express Mobile's Patent L.R. 3-1 Infringement Contentions, nor an admission
4 that those contentions are sufficient. Magento's disclosure is not an admission that Express
5 Mobile has properly identified accused instrumentalities or provided Magento with proper
6 notice as to what the "period of alleged infringement" is.

7 Magento reserves the right to supplement or amend this disclosure as discovery
8 continues.

9 **E. Patent L.R. 3-4(e)**

10 Magento identifies the following as constituting "agreements that may be used to
11 support the party denying infringement's damages case:"

12 Magento has thus far identified an agreement that may be used to support Magento's
13 damages case, but the agreement is subject to confidentiality obligations to a third party. The
14 parties have agreed that this agreement may be produced with the designation "Highly
15 Confidential – Attorneys' Eyes Only – Third Party Confidential," and that the document will
16 be maintained as outside counsel's eyes only. Subject to these restrictions, Magento
17 identifies the following bates range:

18 MAG007750 - MAG007759

19 Magento reserves the right to supplement or amend this disclosure as discovery
20 continues. Further, Magento understands that there may be agreements involving Express
21 Mobile that have not been produced or that have not been produced in their entirety.
22 Magento reserves the right to rely, in its damages case, upon agreements produced by
23 Express Mobile, though this reservation should not be taken as an assertion that any
24 agreements involving, or produced by, Express Mobile are relevant, constitute comparable
25 licenses that would result from a hypothetical reasonable royalty negotiation between
26 Magento and Express Mobile, or otherwise are appropriate to consider in assessing any
27 damages in this matter.
28

1 Dated: July 12, 2019

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Appendix A

Each row of the tables below identify a primary reference that anticipates or renders obvious, alone or in combination with the knowledge of a person of ordinary skill, the Asserted Claims of the '397 patent and the '168 patent, respectively. Each row of the tables further identifies secondary references that render obvious the Asserted Claims in combination with the primary reference.

Any combination of a primary reference with one or more of its secondary references may be used to form an obviousness combination for the reasons described herein and to be further explained during the expert report and discovery phase of this litigation according to the Court's scheduling order. Further information regarding exemplary disclosures of these references is found in the Exhibits hereto. Magento reserves the right to assert any combination of the references referred to in these Invalidity Contentions, including the Exhibits hereto. The table below is provided for convenience and is subject to all reservations of rights.

Table A –Prior Art Systems or References That Anticipate and/or Render Obvious Each Asserted Claim of the '397 Patent

Primary Reference	Secondary References
U.S. Patent No. 5,842,020 to Faustini ("Faustini")	Applicant admitted prior art; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; U.S. Patent No. 6,209,029 ("Epstein"); U.S. Patent No. 6,880,129 ("Lee"); U.S. Patent No.

Primary Reference	Secondary References
	5,475,843 (“Halviatti”); SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer’s Guide (Nov. 1997); SilverStream Programmer’s Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
PCT International Pub. No. WO 98/20434 to Lenz (“Lenz”)	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer’s Guide (Nov. 1997); SilverStream Programmer’s Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE

Primary Reference	Secondary References
	LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
U.S. Patent Publication No. 2002/0091725 to Skok ("Skok")	Applicant admitted prior art; Faustini; Lenz; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
U.S. Patent No. 6,185,587 to Bernardo ("Bernardo")	Applicant admitted prior art; Faustini; Lenz; Skok; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer;

Primary Reference	Secondary References
	<p>FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
U.S. Patent No. 6,175,842 to Kirk ("Kirk")	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial</p>

Primary Reference	Secondary References
	(Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
U.S. Patent No. 6,313,835 to Gever ("Gever")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
U.S. Patent No. 6,343,302 to Graham ("Graham")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever;

Primary Reference	Secondary References
	<p>Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
U.S. Patent No. 6,396,500 to Qureshi ("Qureshi")	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream</p>

Primary Reference	Secondary References
	<p>Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
U.S. Patent No. 6,230,174 to Berger ("Berger")	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide</p>

Primary Reference	Secondary References
	(Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
U.S. Patent No. 6,141,018 to Beri ("Beri")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
U.S. Patent No. 6,369,821 to Merrill ("Merrill")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects

Primary Reference	Secondary References
	Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
<p data-bbox="256 1291 901 1480">Netscape Communicator system by Netscape Communications Corp. ("Netscape Composer"); Netscape Composer for Dummies by Ray ("Ray"); and Netscape Navigator Gold 3 Deluxe Edition by Lemay ("Lemay").</p> <p data-bbox="256 1512 901 1627">These references concern a prior art system and, as such, should be considered as a single primary reference.</p>	<p data-bbox="950 1291 1461 1911">Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti;</p>

Primary Reference	Secondary References
	SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Netscape Communicator system by Netscape Communications Corp. ("Netscape Composer")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0

Primary Reference	Secondary References
	Application Server; and/or the knowledge of one of ordinary skill in the art.
Netscape Composer for Dummies by Ray ("Ray")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Geve; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Netscape Navigator Gold 3 Deluxe Edition by Lemay ("Lemay")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Geve; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer;

Primary Reference	Secondary References
	<p>FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
<p>NetObjects Fusion 4.0 system by NetObjects, Inc.; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; and NetObjects Fusion Dynamic Actions Reference;</p> <p>These references concern a prior art system and, as such, should be considered as a single primary reference</p>	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998);</p>

Primary Reference	Secondary References
	SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
NetObjects Fusion 4.0 system by NetObjects, Inc.	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
NetObjects Fusion 4.0 User Guide by NetObjects, Inc.	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects

Primary Reference	Secondary References
	Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
NetObjects Dynamics Page by NetObjects Inc.	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream

Primary Reference	Secondary References
	1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
NetObjects Fusion Dynamic Actions Reference by NetObjects, Inc.	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary

Primary Reference	Secondary References
<p>SilverStream System by SilverStream Software (“SilverStream”); and SilverStream 2.0 by Minnick (“Minnick”)</p> <p>These references concern a prior art system and, as such, should be considered as a single primary reference.</p>	<p>skill in the art.</p> <p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer’s Guide (Nov. 1997); SilverStream Programmer’s Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
<p>SilverStream System by SilverStream Software (“SilverStream”)</p>	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4;</p>

Primary Reference	Secondary References
	<p>Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
SilverStream 2.0 by Minnick ("Minnick")	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream</p>

Primary Reference	Secondary References
	Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
<p data-bbox="256 569 846 674">GeoCities system by David Bohnett and John Rezner ("GeoCities"); and Creating GeoCities Websites by Sawyer ("Sawyer")</p> <p data-bbox="256 716 906 821">These references concern a prior art system and, as such, should be considered as a single primary reference.</p>	<p data-bbox="950 569 1463 1766">Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
GeoCities system by David Bohnett and John Rezner ("GeoCities")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay;

Primary Reference	Secondary References
	NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Creating GeoCities Websites by Sawyer ("Sawyer")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream

Primary Reference	Secondary References
	Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
<p data-bbox="256 888 906 993">FrontPage 2000 system by Microsoft Corp. ("FrontPage"); and Special Edition Using FrontPage 2000 by Randall ("Randall")</p> <p data-bbox="256 1035 906 1140">These references concern a prior art system and, as such, should be considered as a single primary reference.</p>	<p data-bbox="950 888 1464 1908">Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Geve; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide</p>

Primary Reference	Secondary References
	(Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
FrontPage 2000 system by Microsoft Corp. ("FrontPage")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Special Edition Using FrontPage 2000 by Randall ("Randall")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion

Primary Reference	Secondary References
	<p>Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
<p>A Visual Programming Tool for User Interface and Web Page Generation by Yan ("Yan")</p>	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream</p>

Primary Reference	Secondary References
	1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Cospace: Combining Web Browsing and Dynamically Generated, 3D, Multiuser Environments by Selfridge ("Selfridge")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server;

Primary Reference	Secondary References
	and/or the knowledge of one of ordinary skill in the art.
Intellect: A System for Authoring, Distributing, and Presenting Multimedia Contents Over the Internet by Liew ("Liew")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Visual Preview for Link Traversal on the World Wide Web by Kopetzky	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall;

Primary Reference	Secondary References
	<p>Yan; Selfridge; Liew; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
Towards the Virtual Internet Gallery by Müller ("Müller")	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997);</p>

Primary Reference	Secondary References
	SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Quint; W3C; W3C1; W3C2; W3C3; and W3C4	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Muller; Amaya; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever;

Primary Reference	Secondary References
<p>These references concern a prior art system and, as such, should be considered as a single primary reference.</p>	<p>Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
<p>Amaya system by W3C ("Amaya")</p>	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide;</p>

Primary Reference	Secondary References
	SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
An Introduction to Amaya by Quint ("Quint")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Ayama; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998);

Primary Reference	Secondary References
	SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Amaya Browsing by W3C, w3.org:80/pub/WWW/Amaya/User/Browsing.html ("W3C")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Amaya Views by W3C, w3.org:80/pub/WWW/Amaya/User/Views.html ("W3C1")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion

Primary Reference	Secondary References
	<p>Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
<p>Amaya Attributes by W3C, w3.org:80/pub/WWW//Amaya/User/Attributes.html ("W3C2")</p>	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Geveer; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream</p>

Primary Reference	Secondary References
	1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Amaya Creating by W3C, w3.org:80/pub/WWW/Amaya/User/creating.html ("W3C3")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0

Primary Reference	Secondary References
	Application Server; and/or the knowledge of one of ordinary skill in the art.
Amaya Homepage by W3C, w3.org:80/pub/WWW/Amaya (“W3C4”)	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Geve; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer’s Guide (Nov. 1997); SilverStream Programmer’s Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Amaya: an Authoring Tool for the Web by Quint (“Quint1”)	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Geve; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0;

Primary Reference	Secondary References
	<p>GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
Java Archives in Java 1.2 by Stanek ("Stanek")	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD;</p>

Primary Reference	Secondary References
	SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Java in a Nutshell: A Desktop Quick Reference for Java Programmers (2d ed.) by Flanagan ("Flanagan")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Geve; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.

Primary Reference	Secondary References
Wireless-adaptation of WWW content over CDMA by Ham ("Ham")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Building Interactive Animations using VRML and Java by Tamiosso ("Tamiosso")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1;

Primary Reference	Secondary References
	<p>W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
<p>Constraint Cascading Style Sheets for the Web by Badros ("Badros")</p>	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide</p>

Primary Reference	Secondary References
	(Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Web Content Delivery to Heterogeneous Mobile Platform by Gaedke ("Gaedke")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Geve; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Tip 80: Resize Applets Within Browser Frames by Lu ("Lu")	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Geve;

Primary Reference	Secondary References
	<p>Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
Adapting Multimedia Internet Content for Universal Access by Mohan ("Mohan")	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros;</p>

Primary Reference	Secondary References
	<p>Gaedke; Lu; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
SilverStream Product Demonstration	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide</p>

Primary Reference	Secondary References
	(Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream Authorized Guide	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Geve; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream 1.5 CD	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Geve; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects

Primary Reference	Secondary References
	Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Epstein	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack;

Primary Reference	Secondary References
	SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Lee	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary

Primary Reference	Secondary References
SilverStream White Paper	<p>skill in the art.</p> <p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
SilverStream 1.0 Starter Pack	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1;</p>

Primary Reference	Secondary References
	W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream 1.0 CD	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide

Primary Reference	Secondary References
	(Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream 1.0a Sampler CD	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream 1.0b Sampler CD	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects

Primary Reference	Secondary References
	Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream Tutorial (Nov. 1997)	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti;

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	SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream Programmer's Guide (Nov. 1997)	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary

Primary Reference	Secondary References
SilverStream Programmer's Guide (Sept. 1998)	<p>skill in the art.</p> <p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
SilverStream Administration Guide (Nov. 1997)	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek;</p>

Primary Reference	Secondary References
	<p>Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
SilverStream Administration Guide (Sept. 1998)	<p>Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide</p>

Primary Reference	Secondary References
	(Nov. 1997); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream INSIDE LOOK Beta 2 Version CD	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Geve; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream 2.0 Application Server	Applicant admitted prior art; Faustini; Lenz; Skok; Bernardo; Kirk; Geve; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0;

Primary Reference	Secondary References
	<p>GeoCities; Sawyer; FrontPage; Randall; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Ham; Tamiosso; Badros; Gaedke; Lu; Mohan; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; and/or the knowledge of one of ordinary skill in the art.</p>

Table B –Prior Art Systems and/or References That Anticipate or Render Obvious Each Asserted Claim of the '168 Patent

Primary Reference	Secondary Reference
U.S. Patent No. 5,842,020 to Faustini ("Faustini")	Applicant admitted prior art; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
U.S. Patent Publication No. 2002/0091725 to Skok ("Skok")	Applicant admitted prior art; Faustini; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky;

Primary Reference	Secondary Reference
	Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
U.S. Patent No. 6,185,587 to Bernardo ("Bernardo")	Applicant admitted prior art; Faustini; Skok; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide

Primary Reference	Secondary Reference
	(Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
U.S. Patent No. 6,175,842 to Kirk (“Kirk”)	Applicant admitted prior art; Faustini; Skok; Bernardo; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer’s Guide (Nov. 1997); SilverStream Programmer’s Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
U.S. Patent No. 6,313,835 to Gever (“Gever”)	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page;

Primary Reference	Secondary Reference
	<p>NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
U.S. Patent No. 6,343,302 to Graham ("Graham")	<p>Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b</p>

Primary Reference	Secondary Reference
	Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
U.S. Patent No. 6,396,500 to Qureshi ("Qureshi")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
U.S. Patent No. 6,230,174 to Berger ("Berger")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham;

Primary Reference	Secondary Reference
	<p>Qureshi; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
U.S. Patent No. 6,141,018 to Beri ("Beri")	<p>Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee;</p>

Primary Reference	Secondary Reference
	Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
U.S. Patent No. 6,369,821 to Merrill ("Merrill")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server;

Primary Reference	Secondary Reference
	and/or the knowledge of one of ordinary skill in the art.
<p data-bbox="246 304 917 493">Netscape Communicator system by Netscape Communications Corp. (“Netscape Composer”); Netscape Composer for Dummies by Ray (“Ray”); and Netscape Navigator Gold 3 Deluxe Edition by Lemay (“Lemay”).</p> <p data-bbox="246 525 917 630">These references concern a prior art system and, as such, should be considered as a single primary reference.</p>	<p data-bbox="950 304 1469 1470">Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer’s Guide (Nov. 1997); SilverStream Programmer’s Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
<p data-bbox="246 1470 917 1554">Netscape Communicator system by Netscape Communications Corp. (“Netscape Composer”)</p>	<p data-bbox="950 1470 1469 1911">Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz;</p>

Primary Reference	Secondary Reference
	FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Netscape Composer for Dummies by Ray ("Ray")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream

Primary Reference	Secondary Reference
	Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Netscape Navigator Gold 3 Deluxe Edition by Lemay ("Lemay")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
<p>NetObjects Fusion 4.0 system by NetObjects, Inc.; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; and NetObjects Fusion Dynamic Actions Reference.</p> <p>These references concern a prior art system and, as such, should be considered as a single primary reference.</p>	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4;

Primary Reference	Secondary Reference
	<p>Quintl; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
NetObjects Fusion 4.0 system by NetObjects, Inc.	<p>Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quintl; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide</p>

Primary Reference	Secondary Reference
	(Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
NetObjects Fusion 4.0 User Guide by NetObjects, Inc.	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
NetObjects Dynamics Page by NetObjects, Inc.	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities;

Primary Reference	Secondary Reference
	Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
NetObjects Fusion Dynamic Actions Reference by NetObjects, Inc.	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream

Primary Reference	Secondary Reference
	Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
<p data-bbox="246 556 917 661">SilverStream System by SilverStream Software ("SilverStream"); and SilverStream 2.0 by Minnick ("Minnick")</p> <p data-bbox="246 703 917 808">These references concern a prior art system and, as such, should be considered as a single primary reference.</p>	<p data-bbox="950 556 1464 1690">Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
SilverStream System by SilverStream Software ("SilverStream")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page;

Primary Reference	Secondary Reference
	<p>NetObjects Fusion Dynamic Actions Reference; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
SilverStream 2.0 by Minnick ("Minnick")	<p>Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD;</p>

Primary Reference	Secondary Reference
	SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
<p data-bbox="246 674 846 779">GeoCities system by David Bohnett and John Rezner ("GeoCities"); and Creating GeoCities Websites by Sawyer ("Sawyer")</p> <p data-bbox="246 821 902 926">These references concern a prior art system and, as such, should be considered as a single primary reference.</p>	<p data-bbox="943 674 1468 1829">Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
GeoCities system by David Bohnett and John Rezner ("GeoCities")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham;

Primary Reference	Secondary Reference
	<p>Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
Creating GeoCities Websites by Sawyer ("Sawyer")	<p>Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee;</p>

Primary Reference	Secondary Reference
	Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
A Visual Programming Tool for User Interface and Web Page Generation by Yan ("Yan")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server;

Primary Reference	Secondary Reference
	and/or the knowledge of one of ordinary skill in the art.
Cospace: Combining Web Browsing and Dynamically Generated, 3D, Multiuser Environments by Selfridge (“Selfridge”)	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer’s Guide (Nov. 1997); SilverStream Programmer’s Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Intellect: A System for Authoring, Distributing, and Presenting Multimedia Contents Over the Internet by Liew (“Liew”)	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek;

Primary Reference	Secondary Reference
	Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Visual Preview for Link Traversal on the World Wide Web by Kopetzky ("Kopetzky")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream

Primary Reference	Secondary Reference
	Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Towards the Virtual Internet Gallery by Müller ("Müller")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Quint; W3C; W3C1; W3C2; W3C3; and W3C4	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System;

Primary Reference	Secondary Reference
	SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Müller; Kopetzky; Amaya; Quintl; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
<p>Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quintl</p> <p>These references concern a prior art system and, as such, should be considered as a single primary reference.</p>	<p>Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Müller; Kopetzky; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998);</p>

Primary Reference	Secondary Reference
	SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Amaya system by W3C (“Amaya”)	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Müller; Kopetzky; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer’s Guide (Nov. 1997); SilverStream Programmer’s Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
An Introduction to Amaya by Quint (“Quint”)	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page;

Primary Reference	Secondary Reference
	<p>NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
<p>Amaya Browsing by W3C, w3.org:80/pub/WWW/Amaya/User/Browsing.html ("W3C")</p>	<p>Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b</p>

Primary Reference	Secondary Reference
	<p>Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
<p>Amaya Views by W3C, w3.org:80/pub/WWW/Amaya/User/Views.html ("W3C1")</p>	<p>Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
<p>Amaya Attributes by W3C, w3.org:80/pub/WWW/Amaya/User/Attributes.html</p>	<p>Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham;</p>

Primary Reference	Secondary Reference
<p>(“W3C2”)</p>	<p>Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer’s Guide (Nov. 1997); SilverStream Programmer’s Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
<p>Amaya Creating by W3C, w3.org:80/pub/WWW/Amaya/User/creating.html (“W3C3”)</p>	<p>Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee;</p>

Primary Reference	Secondary Reference
	Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Amaya Homepage by W3C, w3.org:80/pub/WWW/Amaya ("W3C4")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server;

Primary Reference	Secondary Reference
	and/or the knowledge of one of ordinary skill in the art.
Amaya: an Authoring Tool for the Web by Quint (“Quint1”)	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; W3C; W3C1; W3C2; W3C3; W3C4; Quint; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer’s Guide (Nov. 1997); SilverStream Programmer’s Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Java Archives in Java 1.2 by Stanek (“Stanek”)	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1;

Primary Reference	Secondary Reference
	Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Java in a Nutshell: A Desktop Quick Reference for Java Programmers (2d ed.) by Flanagan ("Flanagan")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream

Primary Reference	Secondary Reference
	Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
PCT International Pub. No. WO 98/20434 to Lenz ("Lenz")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
FrontPage 2000 system by Microsoft Corp. ("FrontPage"); and Special Edition Using FrontPage 2000 by Randall ("Randall") These references concern a prior art system and, as such, should be considered as a single primary reference.	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System;

Primary Reference	Secondary Reference
	SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
FrontPage 2000 system by Microsoft Corp. ("FrontPage")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide

Primary Reference	Secondary Reference
	(Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Special Edition Using FrontPage 2000 by Randall ("Randall")	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream Product Demonstration	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects

Primary Reference	Secondary Reference
	Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream Authorized Guide	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b

Primary Reference	Secondary Reference
	Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream 1.5 CD	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
Epstein	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham;

Primary Reference	Secondary Reference
	<p>Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
Lee	<p>Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein;</p>

Primary Reference	Secondary Reference
	SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream White Paper	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary

Primary Reference	Secondary Reference
SilverStream 1.0 Starter Pack	<p>skill in the art.</p> <p>Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.</p>
SilverStream 1.0 CD	<p>Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration;</p>

Primary Reference	Secondary Reference
	SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream 1.0a Sampler CD	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD;

Primary Reference	Secondary Reference
	SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream 1.0b Sampler CD	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream Tutorial (Nov. 1997)	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek;

Primary Reference	Secondary Reference
	Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream Programmer's Guide (Nov. 1997)	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2

Primary Reference	Secondary Reference
	Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream Programmer's Guide (Sept. 1998)	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream Administration Guide (Nov. 1997)	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1;

Primary Reference	Secondary Reference
	W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream Administration Guide (Sept. 1998)	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997);

Primary Reference	Secondary Reference
	SilverStream INSIDE LOOK Beta 2 Version CD; SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream INSIDE LOOK Beta 2 Version CD	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky; Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream 2.0 Application Server; and/or the knowledge of one of ordinary skill in the art.
SilverStream 2.0 Application Server	Applicant admitted prior art; Faustini; Skok; Bernardo; Kirk; Gever; Graham; Qureshi; Berger; Beri; Merrill; Netscape Composer; Ray; Lemay; NetObjects Fusion 4.0; NetObjects Fusion 4.0 User Guide; NetObjects Dynamics Page; NetObjects Fusion Dynamic Actions Reference; SilverStream System; SilverStream 2.0; GeoCities; Sawyer; Yan; Selfridge; Liew; Kopetzky;

Primary Reference	Secondary Reference
	Müller; Amaya; Quint; W3C; W3C1; W3C2; W3C3; W3C4; Quint1; Stanek; Flanagan; Lenz; FrontPage; Randall; SilverStream Product Demonstration; SilverStream Authorized Guide; SilverStream 1.5 CD; Epstein; Lee; Halviatti; SilverStream White Paper; SilverStream 1.0 Starter Pack; SilverStream 1.0 CD; SilverStream 1.0a Sampler CD; SilverStream 1.0b Sampler CD; SilverStream Tutorial (Nov. 1997); SilverStream Programmer's Guide (Nov. 1997); SilverStream Programmer's Guide (Sept. 1998); SilverStream Administration Guide (Nov. 1997); SilverStream Administration Guide (Sept. 1998); SilverStream INSIDE LOOK Beta 2 Version CD; and/or the knowledge of one of ordinary skill in the art.

PROOF OF SERVICE

I am employed in the County of Dallas, State of Texas. I am over the age of 18 years and not a party to the within action. My business address is 2021 McKinney Ave, Suite 2000, Dallas TX, 75201.

On July 12, 2019 I served the document(s) described as

**• MAGENTO'S SUPPLEMENTAL PATENT LOCAL RULE 3-3 INVALIDITY
CONTENTIONS AND PATENT LOCAL RULE 3-4 DISCLOSURES**

on all interested parties in this action as follows (or as on the attached service list):

Timothy Devlin (*pro hac vice*)
Robert Dean Kiddie, Jr. (*pro hac vice*)
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rkiddie@devlinlawfirm.com
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☐ (U.S. MAIL) I served the foregoing document(s) by U.S. Mail, as follows: I placed true copies of the document(s) in a sealed envelope addressed to each interested party as shown above. I placed each such envelope for collection and mailing at Sidley Austin LLP, San Francisco, California. I am readily familiar with the Firm's business practice for collection and processing of correspondence for mailing. Under that practice, the correspondence would be deposited in the United States Postal Service on that same day in the ordinary course of business, with postage thereon fully prepaid.

☒ (E-MAIL) I caused the document(s) to be delivered by e-mail to each interested party as shown above.

1 I declare under penalty of perjury under the laws of the State of California that the above
2 is true and correct.

3 Executed on July 12, 2019 at Dallas, Texas.

4
5 /s/ Andrew T. Langford

Andrew T. Langford